

To all UKCP Registrants

From Carmen Ablack, candidate for Chair UKCP

This election is about the development of the UKCP for each and every member, the development of our work with clients and the voice and role of psychotherapy in the wider world.

This is what I have been working towards, along with many others, tirelessly for years. I will continue to do this vital work with the support of your votes.

UKCP is in favour of national regulation of psychotherapy and has always taken this stance; it is why we were created in the first place. Regulation is about the public perception of safety in the their psychotherapist. The election for Chair of UKCP is about much more than the HPC as our statutory regulator.

If done well enough, statutory regulation provides status to us all on a level playing field and reassures our clients and patients. UKCP must continue to work towards ensuring that what is offered at the end of the current process is done well enough for us to feel able to sign up to it at the final count.

HPC and Statutory Regulation

Regulation by HPC has recently been moving in the right direction.

We must continue dialogue and negotiation to ensure that the standards and practices of the HPC are fit for purpose from our perspective as practitioners, trainers, educators, supervisors and consultants in the fields of psychotherapy and psychotherapeutic counseling. We have to deal with the HPC and we must continue having discussions with other professional bodies about the possibility of a psychological professions regulator; this is what UKCP have been doing for the past few years, with effect and impact.

HPC are now revising their generic standards – something we have been discussing for quite a while with them. I have spent literally years working on the various negotiations and challenges and am committed to continuing this right up to the end.

From the recent MIND submission to HPC:

“Mind understands that the HPC intends to amend the ‘black rubric’ (*the generic standards written in black*) so that its language is made more appropriate for the psychotherapy and counselling professions. Such amendments should be made before the proposed standards of proficiency are finalised and sent to the Department of Health later in the year.”

UKCP have stated unequivocally, explicitly and robustly exactly what needs to be changed in the standards of HPC in order for us to see them as fit for the purpose of regulating our registrants. Do please read our submission in full on the UKCP website and make up your own mind; do not let someone else tell you what is there - judge for yourself:

http://www.psychotherapy.org.uk/health_professions_council.html

UKCP must increase collaborative working with the other professional bodies to ensure that we can effectively negotiate with the Department of Health in preparation for the regulatory legislation. *This is our next and important task on statutory regulation.*

Diversity

In response to the following question on the HPC consultation document:

Question 15: Do you agree that the level of English language proficiency should be set at level 7.0 of the International English Language Testing System (IELTS) with no element below 6.5 or equivalent?

BACP state that they accept the recommendation; in the submission from IAPT (which is not a voluntary regulator) they say

“We feel level 7 would be more appropriate given that ***psychological therapies are solely reliant on the use of language***” (my italicised bold).

I recognise the right of other professional bodies and interested parties to choose to take whatever position they wish in the interests of their registrants or own employee training schemes.

I repudiate compliance with an ostensibly discriminatory requirement. The fact that IAPT can claim psychological therapies are solely reliant on the use of language whilst additionally wanting an already discriminatory level raised, says an awful lot about *their very limited understanding of psychotherapy and counseling*.

I will continue to challenge all attempts by IAPT to have greater influence in the delivery or training of any psychological therapies. Given the above, I think it is vital UKCP take this position.

The limited success of IAPT must be exposed. In principle greater access for the public to psychological therapies is a good idea; in reality IAPT's version of this has been badly implemented and is having a negative effect on clients who are not getting the choice or range of service they really need. The attachment of IAPT to narrow NICE guidelines - as if they are bible - is one of the least edifying

aspects of the NHS and its constituent parts that we have to deal with. These are the challenges.

UKCP position on HPC English Language Requirements (from our submission):

- a. We believe there are serious diversity and equalities implications with these particular standards. They are overly focussed on employer need rather than the effective understanding and use of language in professional practice. As statutory registration with HPC is a general registration for practice it seems incumbent on HPC to remove such employer-focussed criteria.
- b. We fail to see how such requirements could be characterised as fundamental to protection of or benefit to the public in the practice of counselling or psychotherapy. We question the appropriateness of the tool being used, and believe it is not proving a sensitive enough instrument.
- c. This is not a requirement that should be applied / included in either profession specific or generic standards and it garnered much critical comment and anger from respondents to UKCP consultation exercise; it is generally seen as discriminatory.
- d. ***The overall generic SOP relating to skills in communication need to include learning ability, comprehension ability and cultural considerations for it to read effectively as equalities and diversity compliant.*** (My bold and italics)

This shows how clearly and robustly UKCP have responded to the HPC consultation. I wrote quite a bit of our submission with Kathi Murphy and I am proud of the work of all our registrants and member organisations that contributed to its overall depth and quality.

Collaborative working and Membership Involvement

I want the teamwork and inclusion of all our members to be developed over the next few years. *If every registrant got involved in the initiatives at some level, imagine what we could achieve.*

We have an estimated 200 people doing voluntary work regularly on behalf of UKCP and the profession. I would like this to become at least 500 or more in the next couple of years. The new structure of UKCP will allow this kind of involvement – some of it in small limited projects and others in more sustained commitment. All commitment, no matter how small is welcomed and needed. I hope some of you reading this will feel inspired to get involved.

I am determined to stick up and fight for the subtleties in our work that cannot be listed in any competencies, standards or otherwise.

With your support I will continue to do the work of representing your legitimate concerns and getting these addressed at HPC, the NHS, the DH and elsewhere as required.

UKCP and the other professional bodies must collaborate in playing a political and educative role with the DH, regulator, potential employers, employee assistant programmes, and insurers. It is why I continue to meet and negotiate on these matters at a political as well as bureaucratic level at HPC, IAPT, and New Ways of Working and more recently why I am turning my attention to New Horizons.

This kind of sustained political work is absolutely necessary if we want to ensure that psychotherapy, as we understand it, does not get marginalized. *UKCP must be seen as the leading body on psychotherapy and the first place journalists, politicians and other clinicians and providers in the field turn to for advice, support and information.*

Voices of clients and patients

We have to make more space for the voice of the client /patient in our considerations of development for the future. It is this voice that holds some of the important contributions on the need for statutory regulation and it is interesting to note what MIND have to say on this:

“Mind welcomes the opportunity to respond to the Health Professions Council’s (HPC) consultation on the regulation of psychotherapy and counselling. This response incorporates the views of people who have used psychotherapy and counselling services. When practitioners are disbarred by their professional association they are legally entitled to continue working. Where sanctions are imposed, there is no legal obligation to implement them.

There is a worrying lack of research on the issue of malpractice and abuse within the psychotherapy and counselling professions. However, in each year of its existence, WITNESS (a charity that promoted safe boundaries between professionals and the public) dealt with roughly 40 cases in which a client felt that he or she had been abused by their psychological therapist. Abuse is clearly taking place and more needs to be done to prevent it.

We recognise that statutory regulation will not end all abuse by psychotherapists and counsellors. However, it will give the system more power to prevent those found guilty of abuse from continuing such practice. (My bold) It will also make the complaints process much easier for people receiving psychotherapy and counselling services to navigate. Furthermore, the independence of the regulation should encourage more services users to come forward without fear of professional bias.”

UKCP continues its negotiations with HPC and hopefully along with other professional bodies, we can continue to press home the need for their complaints processes to be made fit for the purpose it is primarily intended to do.

All practitioners must take the last point made by MIND seriously; ***clients need to know that their complaint is being dealt with independently***, this is the level playing field for the client and we need to respect their human rights and dignity in this. ***Any other position is unworthy of us as practitioners.***

The above includes the preferred approach of UKCP to dealing with concerns and impasses through mediation and alternative dispute resolution processes. These inform the on-going discussions with HPC.

HPC is not our main challenge; psychotherapy and our interest in all matters psychotherapeutic are not restricted to or by regulation.

We must ensure that we get what we need from statutory regulation and get on with the real fundamental challenges of NICE guidelines, marginalized workplaces and the ever desperate attempts of IAPT to claw into areas that it is unqualified to handle, in order to retain its funding.

Our efforts must include collaborative and effective working with other professional bodies, service provider organizations, service user organizations and other mental health and well being organizations. UKCP must bring our expertise and knowledge to bear in the many political and bureaucratic arenas of importance.

We must all turn our attention to the role that psychotherapy has to play in wider society.