



UKCP COUNCIL OF PSYCHANALYSIS AND JUNGIAN ANALYSIS (CPJA)

**RESPONSE TO HPC CONSULTATION ON STATUTORY
REGULATION OF PSYCHOTHERAPISTS AND COUNSELLORS**

16 TH OCTOBER 2009

A Response to the HPC Consultation Document from Council of Psychoanalysis and Jungian Analysis(CPJA)

CPJA is the largest organization of psychodynamic, psychoanalytic and Jungian psychotherapists in the UK. It is a section of UKCP and comprises 32 member organizations , and 1600 individual registrants who work in diverse settings, with UKCP as the umbrella body. Whilst the UKCP as a body has made a submission to the HPC consultation and the Draft Standards of Proficiency, we wish to take the opportunity to address the points as they relate to the work conducted by psychoanalytical psychotherapists

In view of this we have decided to focus on the draft Standard of Proficiency and in this sense, we especially welcome the point made in 7.1.3 and indication that the HPC intends 'to review the language of the existing standards of proficiency in order to make them more appropriate to a wide range of professions it regulates and may regulate in the future'. We note that there will be particular work to address the language of 'health and social care' and 'dysfunction'. We thoroughly endorse and welcome this intention because although what we do as psychotherapists relates to fields as 'social care' and 'mental health', it is also fundamentally distinct from them.

Psychotherapy aims to create or strengthen the capacity for self-discovery. It involves a process which aims to help people understand and resolve difficulties by increasing their awareness of unconscious feelings and their influences over relationships and ways of being in the world. Its role is not limited only to those with psychological disorders (or mental health problems), rather, it aims to facilitate personal growth and a greater sense of fulfilment. We suggest that the language used needs to reflect this aim.

Psychotherapy is not about 'doing things to people' (applying strategies and techniques and so on) but much more about a meeting between two individuals (or more where there is couple or family work) with active involvement from the outset. It will be important to reflect these points to maximize the meaningfulness and purchase of the HPC's intentions overall.

Specific points

We highlight a few examples of where we feel that the language of the standards needs to be changed so as to better represent psychotherapy in general. For the most part, the sections designed for psychotherapists and counsellors make sense, though we offer some observations on these, as well as indicating how the general standards can be made more inclusive or relevant, and which standards are simply not relevant to psychotherapy and counselling.

1a.1 Psychotherapists and counsellors (blue) – We think that 'be able to recognise and work through the complexities of the dynamics of power and authority' would better reflect the fact that relations of power and authority are at the heart of the endeavour of therapy. Psychoanalytic psychotherapy addresses a relationship of helper and helped in a particular way - seeking to repair the capacity of person in the role of patient to 'generate their own truths'.

1a.4 In the context of psychotherapy we think that the wording 'understand the importance of consent and recognise the complexities of the meaning of consent to participation in a process in which the outcome is unknown' would be better.

1a.6 We would suggest that the second point here 'be able to initiate resolution of problems and be able to exercise personal initiative' be translated into 'be able to work with people in constructive ways so as to facilitate people's own capacity to address their problems'

1b.3 Whilst communication in English may be important in order to pass a training course or be accredited, we assume that the HPC would not wish to exclude those therapists who are able to work in other languages too. We wonder if the wording should be changed in these requirements so as to better reflect the positive contribution that can be made via psychotherapists' fluency in different languages and therefore extended capacity to work with a diverse range of client groups (including minorities).

1b.4 We would note here that in psychotherapeutic endeavours 'effective communication' is emergent from the process of therapy; effective 'treatment' is not contingent on the interpersonal skills of the therapist alone. r wording here would be 'recognise that effective communication is a shared endeavour'

2. Identification and assessment of 'health and social care' needs. Our general points above are relevant here insofar that psychotherapy does not involve a unidirectional relationship in which one party does things to the other (like a doctor-patient relationship), rather there is a shared process of discovery; thus the identification of problems and difficulties may change over time. The HPC have already acknowledged the need to address the limitations of the language of 'health and social care' for psychotherapists and counsellors. Could we please add that the wording in sections 2a.2, 2a.3 and 2a.4 does not offer a close fit with what psychotherapists and counsellors do and we recommend that this is also reviewed.

2b.1 'be able to demonstrate a logical and systematic approach to problem solving'. We would like to suggest alternative wording here 'be able to enable clients to develop their own capacity to generate problem-solving skills'.

2b.3 Given that psychotherapeutic endeavour is sometimes open-ended , and may be concluded when the client himself/herself suggests an ending) we would like to suggest that you add 'where appropriate' to 'be able to formulate specific and appropriate management plans, including the setting of timescales'

2b.4 Again, this reflects a medical setting and a doctor/patient relationship with one person doing things to another. For psychotherapists and counsellors better wording would be 'be able to do our work safely and skilfully'.

2c.1 Whilst research is of obviously of interest and relevance to psychotherapists and counsellors and reflective practice is positively encouraged and required in professional trainings, the references in this section to 'intervention plans', 'recognised outcome measures', 'techniques and procedures' and so on reflects a different stance to that of psychotherapists and counsellors. Therefore there is much here that is not relevant to us.

2c.2 Again, the language of 'audit trail' and 'outcome measures' does not accurately reflect the approach of psychotherapy and counselling.

3. We would like to endorse reference to footnote 3 in the (blue) section for psychotherapists and counsellors. Stakeholders' views are very important here.

Psychotherapy and Counselling specific sections in red: we would like to suggest the following wording: - 'understand different presentations of a range of psychological disorders', and 'understand methods of diagnosis of a range of psychological disorders appropriate to the theoretical approach and appreciate the consequences of particular psychological disorders in the process of analysis and context of the therapeutic relationship' and 'understand and implement work with a client to address the origins and causes of a range of psychological disorders'

Section 8

Education and Training

We would like to add a further point, if we may, which is to reinforce the notion of diversity of approaches to education and training (8.3.1. 28) and recognition that registration entry criteria should include those without formal qualifications who are deemed to have reached an equivalent standard by their professional training bodies (by virtue of experience and demonstration of functioning). This will be important so as to be able to benefit from such therapists and counsellors' contributions as well as to be in line with the inclusive intentions of broader government agendas.

CPJA would also like to see the approval process for education providers being extended to include UKCP Accrediting Organisations

Concluding point

We suggest a reading of CPJA Standards of Proficiency in Psychoanalytic Psychotherapy as good illustration of the kind of language and approach taken by psychoanalytic psychotherapists. As indicated, we think that attention to the language and distinctive aims of psychotherapy will increase the legitimacy of the HPC's purpose. Please see attached Appendix CPJA 1 CPJA Competencies document