

‘The heart of our work is the hurt in our own hearts’

From CPCAB philosophy (www.cpcab.co.uk/about/philosophy)

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1. Introduction

This discussion paper represents the Counselling and Psychotherapy Central Awarding Body’s (CPCAB) contribution to the current debate surrounding the prospective UK regulation of counselling together with its implication for practice/training standards and the future of the counselling profession within the UK.

In 2007 the main professional body for counselling - the British Association for Counselling (BACP) - distributed for consultation a “Core Curriculum” document that set out its views in relation to these issues and this discussion paper necessarily refers to this key document.

CPCAB is approved by the UK Government's Qualifications and Curriculum Authority (QCA) as a specialist awarding body to develop and deliver counselling qualifications across the UK. Its core staff are experienced practitioners, supervisors and trainers accredited with either BACP, the United Kingdom Council for Psychotherapy (UKCP) or the British Psychological Society (BPS). The therapeutic traditions represented in the CPCAB staff team include Humanistic (including Client-Centred), Transpersonal, Psychodynamic, Cognitive-Behavioral and Integrative. Established in the early 1990’s CPCAB currently register over 11,000 candidates a year across 140 FE colleges and private training centres. CPCAB is, therefore, a stakeholder in both the vocational qualification reform programme and the regulation of counselling as a profession and it is very keen to ensure that its qualifications are fit-for-purpose in this changing landscape.

2. A rich and diverse profession that requires a balanced approach to regulation

The history of the UK counselling and psychotherapy profession is a subtle and complex one and the following brief description is, therefore, a necessary simplification. Important elements have been omitted but, hopefully, it provides the reader with a flavour of both the profession's richness and its diversity.

Counselling and psychotherapy has its origins in the work of Sigmund Freud and the psychodynamic tradition established in Europe at the turn of the 20th century. During the middle of the 20th century, however, many of its major developments were in the United States within two separate traditions that arose *in very explicit opposition* to the work of Freud: the Behavioral tradition (later Cognitive-Behavioral Therapy - CBT) and the Humanistic Psychology tradition. During the 1950's one particular approach called 'Client-Centred Therapy' was developed by the Humanistic Psychologist Carl Rogers who renamed the patient a 'client' and the therapist a 'counselor' and, in so doing, founded the field of 'Counseling'. Counseling was then imported into the UK and, over the last 50 years, the UK tradition of 'Counselling' has grown into a mature profession that is Humanistic in origin, but which also integrates important elements of the UK psychodynamic tradition together with elements of the UK CBT tradition. UK Counselling also integrates conclusions from academic research especially in relation to the nature and importance of the therapeutic relationship.

Over the last century these three traditions have been developing via a very fruitful conflict with each other based on three very different philosophical views of the nature of the human condition. In the European-based psychodynamic tradition this condition is seen, in common with many Eastern perspectives, to be *essentially one of 'suffering' and the best one can reach is an adult accommodation with that condition*. The CBT tradition, on the other hand, is rooted in mainstream science: *human beings, in order to be happy, need to develop an approach to the world based on rationality and the conclusions of psychological science*. The Humanistic Psychology tradition developed in marked opposition to both the psychodynamic and the behavioral. Its socio-economic context was the wealthy industrialised United States where many of the basic needs for food and shelter were being met and many common health problems had been solved. Humanistic Psychologists argued that *human beings can choose to develop themselves and reach for their full potential*. Importantly, Humanistic Psychology - in explicit contrast with CBT and mainstream science - argued that to do this, what was needed was a qualitatively different way of understanding human beings, a qualitatively different 'epistemology'. Rather than the *objective* approach of mainstream science, what was needed was a way of understanding from the *inside-out*.

There are a wide range of other approaches that have grown up in this rich century of development including *family systems therapy* - a specialised branch of psychotherapy

that works with couples and families. Most of the founders of this approach were psychoanalytic in background although the various schools of family therapy integrate systems theory with elements from the main traditions.

This history is important because it helps to explain the diversity, complexity and maturity of the UK field of counselling and psychotherapy. It also serves to highlight a very important challenge in the regulation of the profession: that the practice/training standards underpinning regulation must accommodate - in a balanced fashion - these traditions. Currently, however, there is considerable disquiet in the profession because the Government is viewed as taking a very biased approach to the field with the perception that CBT is its clear favourite, the psychodynamic accepted but ***the humanistic tradition excluded***. For example:

*“Our view of a comprehensive mental health programme is that it should provide three main modalities. These are **psychoanalytic or psychodynamic, cognitive behavioural therapy, and family or systemic psychotherapy**. Most other modalities are variants of these or post-basic specialisms.”*

Published on the Prime Minister’s website: www.pm.gov.uk/output/Page14969.asp

Since ***the vast majority of counsellors in the UK - and the largest group of psychotherapists¹ - have been trained within the Humanistic tradition***, this does not foster a positive attitude to the regulation process. It also plays into, and accentuates, the negative side of the ‘fruitful conflict’ between the traditions described above: ***the Government is now seen to be on the CBT side of the ‘battle’ between these three traditions***. Finally it serves, unfortunately, to propagate a view of the Government’s regulation agenda as based either on a gross lack of understanding of the profession or on an attempt to mould the profession for its own purposes. ***This bias clearly needs to be addressed - through taking a balanced approach to the traditions - if regulation of counselling and psychotherapy is to be at all successful.***

3. A different epistemology from mainstream science

Counselling is rooted in the Humanistic Psychology tradition and this has important implications for its epistemology: the nature of its knowledge base. Although the Humanistic tradition encourages and integrates academic research, its epistemology is fundamentally different from that of mainstream psychology and mainstream science. In essence, the humanistic epistemology of counselling is *a very practical one based on the subjective experience of the self within a body, within an interpersonal world of close relationships*. It is, therefore, an epistemology of the subjective - one based on embodiment, emotionality, day-dreams and imaginings, the stories we live by and most

¹ The Humanistic and Integrative section is the largest of the 5 sections of UKCP

importantly, *the experience of being in relationship with other people - for whom we feel a great deal.*

It is not enough, within this epistemology, within this way of understanding human 'being', to talk *objectively* about self or talk *objectively* about relationships. Training in this tradition means learning about the world of self and other from the inside-out: in this type of training, academic research on the therapeutic relationship will be studied but exercises will also be undertaken where the trainee, for example, imagines being the client and then talks about the counsellor (i.e. themselves) from the client's perspective. Academic research on loss will also be studied but the training's emphasis is on what loss *feels* like to the client and what it *feels* like, as a counsellor, to stay with the emotional pain and 'work it through' with the client. Doing this requires that the counsellor is, themselves, experienced in this 'inner work'.

Although counselling can be viewed as one form of psychological therapy it has, therefore, an experiential epistemology that contrasts with the objective epistemology of mainstream psychology and mainstream science. This has very important implications for the training standards associated with regulation.

With reference to the BACP Core Curriculum mentioned at the start of this discussion paper, its language often appears to be more about "psychological therapy" than "counselling". The BACP document refers, for example, to "psychological difficulties" and "psychological presentations", the formation of "psychological conceptualisations" and the application of "psychological theories". CPCAB wishes to challenge the blurring of distinctions between *counselling* and *psychological therapy* which is a feature of the BACP core curriculum document and encourage the BACP, as the main professional body for counsellors, to value and defend the epistemology of counselling.

4. Two sets of linked standards will form the *heart* of the profession

The proposed regulatory system will be based on two sets of linked standards: Sector Skills Council *National Occupational Standards* which have existed for a number of years (previously held by the Employment National Training Organisation - ENTO) and linked Health Professions Council *Standards of Proficiency* which have yet to be devised. The Sector Skills Councils (SSCs) hold responsibility for developing and maintaining the currency of all occupational standards including those for counselling. Importantly, all qualifications on the government's new national Qualifications and Credit Framework (QCF) will need to both map to these standards and be approved by the SSC now responsible for them: Skills for Health (SfH). This means that *Skills for Health will be responsible for setting standards for the counselling profession: standards for counselling practice and counselling training.* Additionally the proposed regulatory body - the Health Professions Council (HPC) - will develop standards of proficiency linked to these SfH

standards. *The HPC standards of proficiency will form the basis for regulation which means that all counselling training, together with all state registered counsellors, will need to meet these standards.*

These two sets of standards will, therefore, represent the heart of the counselling profession and it is of vital importance that they are fit for purpose. They must, therefore, be founded in the epistemology that counselling is founded in, and which continues to form the heart of the profession: that of the Humanistic Psychology tradition.

CPCAB is, however, concerned that the current NOS (revised in 2007) are not fit for purpose since the *NOS fail to capture the core activity of counselling either in broad terms or at the depth required* for the following key reasons:

- The NOS do not embody the experiential, emotional and interpersonal knowledge and skills that lie at the heart of counselling epistemology and counselling practice.
- There is a lack of balance in the criteria with too much focus on practice management and service delivery and too little on therapeutic competence.
- There is insufficient focus on the therapeutic relationship. Research conclusively shows this to be the single most effective factor in therapeutic change - whatever the theoretical model or counselling approach being used. This key competency must, therefore, be central to the standards.
- The language used is frequently specific to one approach and is therefore not applicable to all counseling approaches.
- Much of the language of the NOS is technically inappropriate for standards.

Additionally, ***the standards do not cover the use of counseling skills*** by professionals in, for example, health and social care ***even though this is a much larger group than that of fully qualified counsellors.***

Clarification is also vital on how the counselling NOS will relate to the new psychological therapy NOS currently being developed by Skills for Health - particularly in the light of the points made above.

This section of the discussion paper has commented on the NOS but the broad argument - that standards must respect both the epistemology of counselling and its diversity of approaches - also applies to the prospective HPC Standards of Proficiency.

5. Counselling is part of ‘health’ provision but is more than a ‘health’ profession

CPCAB recognises that counselling has an important role to play in preventative healthcare, holistic treatment and mental health promotion with a proven record of

alleviating anxiety and depression. It is, therefore, an important treatment option within health provision - as research increasingly acknowledges.

Counselling is, however, rooted in the Humanistic Psychology tradition and has, therefore, a much broader and more ambitious role in facilitating self development and human potential. It is important that the future of counselling should not be determined by its role in healthcare provision alone. ***There needs, therefore, to be a clear recognition - within both the NOS and the HPC standards of proficiency - that counselling does not just take place in a healthcare context.***

6. Entry levels and entry routes to registration

6.1 Overview

Protecting vulnerable people from incompetent counsellors is essential and the most obvious way of doing this is to set appropriate standards of practice together with qualifications/training mapped to those standards and an associated register of practitioners that have met the standards. In principle, therefore, CPCAB supports the regulation of the counselling profession. The system of regulation must, however, be fit for purpose.

6.2 Raising the entry level may not protect the public and may lead to major reductions in counselling services

At what level should entry to the counselling profession be set? Currently most counsellors (including those accredited by BACP which is the current “gold standard” for employers) are initially trained to Level 4/5 and become eligible for accreditation after a minimum period of supervised practice experience. The UKCP Psychotherapeutic Counselling Section also sets the practitioner level for psychotherapeutic counsellors at Level 5.

The entry level for counsellors proposed in, for example, the BACP core curriculum document (BACP 2007) is, however, Level 6/honours degree. We have been unable to identify any rationale for raising the entry to this level, nor can we find any evidence that this radical change in training level for counsellors is either necessary, beneficial or “proportionate to the risks” that currently exist (see DoH white paper “*Trust Assurance and Safety*” p.2).

Raising the entry level to 6/honours degree could have a negative impact on the provision of counselling services. Currently most employed counsellors (paid and voluntary) work in a broad range of counselling agencies with very limited financial resources and raising the entry level to 6/honours degree would clearly lead to major cuts in these low budget services. Further, the NHS (the single largest organisation employing counsellors) has already completed work defining counselling roles and pay scales in the NHS Agenda for

Change which sets counselling practice at Level 4 and 5. We also understand that NHS employers view the prospect of new, more highly qualified counsellors (A4C level 7) as too expensive to employ.

Additionally, we believe that if the entry level is set at Level 6/honours degree it is likely to leave many of those currently practicing counselling outside the scope of regulation with large numbers either choosing to practice under a non-regulated title or, in the case of agencies, choosing to offer services under a non-regulated title. Additionally, significant numbers of working counsellors, who will not qualify under, for example, the BACP's proposed grand-parenting scheme, could be disenfranchised and potentially lose their jobs.

Raising the entry level to 6/honours degree will not properly protect the public in the areas where the majority of counsellors now practice - counselling agencies and independent practice.

Currently, it is not yet clear what titles and associated functions will be regulated by HPC. Our view, however, is that while there is undoubtedly an overlap between counselling and psychotherapy, the argument that there is *no difference* between counselling and psychotherapy is unhelpful for the purposes of regulation. There is a 'continuum of practice' in counselling and psychotherapy: at one end a practitioner may offer supportive counselling to someone coping with a common life problem (such as loss or bereavement) whilst in the middle of the continuum there is work with the common mental health problems and at the far end of the continuum, work with severe and complex mental health problems. CPCAB supports the conclusions of UKCP and the NHS and we therefore propose a recognition of this continuum of practice through clearly differentiating between counselling and psychotherapy as follows:

Counsellors – practitioners qualified at level 5
Psychotherapists – qualified at level 7

Additionally we would also support a “low intensity” worker (title to be determined) qualified to Level 4.

There is a need for further consultation on this issue before a decision is taken: no cogent argument has yet been made for setting the entry level for counsellors at 6/honours degree and the profound implications of this proposal have not been fully examined.

6.3 Reducing the choice of entry routes will reduce access to the profession

The BACP core curriculum document proposes an HE-only entry route. Our understanding is, however, that more trainees currently choose to train at Further Education colleges and private courses rather than at universities. ***Once again we have***

been unable to identify any rationale for this proposal to transform the field of counselling training. Neither have we found any coherent argument that an HE course is better at developing and assessing counsellor competence. Additionally, the current BACP proposal runs counter to the government's stated intention of achieving parity between vocational and academic qualifications.

We would argue that, in the case of counselling, *developing the core emotional-interpersonal ways of knowing of the counsellor is best achieved in an environment that values a practical, hands-on vocational approach* rather than one that emphasises the development of academic skills.

An HE-only route would certainly narrow access to the counselling profession. This has serious implications for principles of inclusion and widening access for both trainees and clients. Counselling requires the widest possible entry route because *counsellors serve the communities they come from*. The best way of achieving this is to enable trainees to continue to undertake vocational qualifications at their local FE college.

Wherever the final entry route is set, therefore, it is important that there is an *explicitly described* vocational route (via qualifications in the QCF) with the option of 'topping up' with an HE honours degree: a vocational route that would be in addition to entry via the HE foundation/honours degree route.

Regulation should be about setting standards, not specific types of qualifications, and these standards should be achievable through vocational qualifications at the appropriate level delivered through a choice of training routes in the HE, FE and private sector.

7. Conclusion

Here in the UK we have a rich, mature and diverse counselling profession which, as a society, we should value and celebrate. Beyond the question of protecting the public, a regulatory system should add value to the profession and it should certainly not threaten it with inappropriate standards and qualifications or reduced access to training.

To maintain the richness and diversity of the UK counselling profession *the two sets of linked standards - that will form the heart of the profession - must be fit for purpose.* They must, therefore, be founded in the epistemology that counselling is derived from, and which continues to form the heart of the profession: that of the Humanistic Psychology tradition. They must also encompass the richness and diversity of contemporary UK counselling approaches. As such the standards must effectively describe the core emotional, self-awareness and relational ways of knowing, and working, that lie at the heart of counselling training and counselling practice.

Additionally there must be *as broad an entry base as is possible to achieve via vocational training available in HE, FE and private settings.*

Hopefully, with standards that are fit for purpose and broad access to training, it will be possible to build a regulatory system that both protects the public and supports the richness and diversity of the profession.

To find out more...

... and to get involved in this important debate about the future of the counselling profession please follow our updates on this subject on our website www.cpcab.co.uk or email us at discussion@cpcab.co.uk.

Notes for editors:

For additional information and CPCAB personnel available for comment and/or for interviews please call **01458 850350**.

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