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Consultation on proposed changes to standards of proficiency
Policy and Standards Department
Health Professions Council
Park House
184 Kennington Park Road
London SE11 4BU

CPCAB Response to HPC Consultation on revised generic Standards of Proficiency

Introduction

CPCAB is a specialist awarding body, regulated by Ofqual, offering counselling and supervision qualifications on the Qualifications and Credit Framework (QCF) from level 2 to level 6. Our staff team includes practising counsellors and psychotherapists. CPCAB is the largest single provider of counselling qualifications in the non-HE sector and represents the FE training sector on the PLG. CPCAB will be directly affected by the current process towards the regulation of counselling and psychotherapy by HPC. Any revision to the generic standards of proficiency will have an impact on the structure of the qualifications offered by CPCAB and all past and present trainees taking vocational qualifications in counselling.

CPCAB welcomes the proposed changes to the generic standards.

Responses to the consultation questions

1. Do you agree that generic standards of proficiency should be retained? Please provide reasons for your response.

Yes.

It is important to have shared overarching standards which allow for profession-specific articulation but which provide a common framework.

2. Do you agree with the proposed new structure of the standards of proficiency? Please provide reasons for your response.

Yes.

CPCAB welcomes the reduction and distillation of the standards. The key areas of professional practice are covered and can be further articulated for counsellors and psychotherapists as appropriate. CPCAB welcomes the specific inclusion of a standard on working with the impact of culture, equality and diversity which was previously lacking. The proposed standards fit well with the CPCAB Model of Practitioner Development which provides the evidence base for our qualifications.

3. Do you agree with the proposed new wording of the generic standards of proficiency? Please provide reasons for your response.

Yes.

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The wording of the 'existing' standards is not appropriate for most models of counselling and psychotherapy. This has led to widespread criticism from practitioners and stakeholders; not just those opposed to HPC as the regulator, but from many individuals and groups who felt strongly and deeply that it was not a framework that fitted with their practice. The PLG continually lodged objections to the language and structure of the SOPs as being inappropriate for counselling and psychotherapy. This sector antipathy to the existing standards was evident in the hostile responses to the consultation.

The wording of the new standards is more inclusive, not rooted in the 'medical model' and can be easily aligned with existing ethical frameworks for professional practice. The standards align well with the content of our counselling qualifications.

4. Do you agree with the proposed order of the generic standards? Please provide reasons for your response.

Yes.

Our only comment is that no. 13 (*be able to draw on appropriate knowledge and skills to inform practice*) falls more logically before nos. 11 and 12 - which are about reviewing said practice.

5. Do you have any additional comments?

Yes.

CPCAB believes that these standards offer a much more helpful framework for developing profession-specific standards for counselling and psychotherapy and for building confidence among practitioners that HPC is an appropriate regulator. Although counsellors and psychotherapists were not directly included in the work for this consultation - being not yet regulated by HPC - we see the proposed revisions to the generic SOPs not only as a huge improvement in themselves but as evidence that HPC does listen and respond to the concerns of its members and prospective members.

CPCAB
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