

Question	Response
<p>Q1: Do you agree that the Register should be structured to differentiate between psychotherapists and counsellors? If not, why not?</p>	<p>Yes. It is important for the public to be able to distinguish between professions easily, particularly where different levels of training and education are concerned, irrespective of the terms being interchangeable. The GOC register differentiates between Dispensing Opticians and Optometrists, with separate competencies for each. Also, it would not be appropriate to only have one entry level educational qualification for both groups.</p>
<p>Q2: Do you agree that the Register should not differentiate between different modalities? If not, why not?</p>	<p>Yes. This would be unnecessary and overcomplicate the issue. It would be difficult for members of the public to differentiate between sub-groups and more appropriate to have generic titles that cover all groups. The level of protected titles should also be proportionate to the regulation required. Any further explanation of the different sub-groups can be provided for by an adjectival title, in professional or patient guidance.</p>
<p>Q3: Do you think that the Register should differentiate between practitioners qualified to work with children and young people and those qualified to work with adults? If yes, why? If not, why not?</p>	<p>No. We appreciate there are differences in the skills required to work with children and adults, though a further differentiation would over complicate the register and may hinder the confidence in the professions as a whole. A generic approach seems more appropriate and adjectival titles can be used by appropriately qualified individuals.</p>
<p>Q4: Do you agree that 'psychotherapist' should become a protected title? If not, why not?</p>	<p>Yes</p>
<p>Q5: Do you agree that 'counsellor'</p>	<p>Yes. We understand that the title is used to a limited extent by other</p>

<p>should become a protected title? If not, why not?</p>	<p>groups outside of therapeutic interventions, though these groups can be addressed by clarifying when a misuse of title would occur.</p>
<p>Q6: Do you agree with the approach to dual registration outlined in the report? If not, why not?</p>	<p>Yes. Given the small number of registrants that this is likely to impact and the difference in practices this approach appears to be appropriate.</p>
<p>Q7: How appropriate are the draft criteria for voluntary register transfers?</p>	<p>The criteria are appropriate, though it is vital that any criteria are always considered against public protection. It is vital that appropriate standards and competence are attained and maintained by those transferring to the register and codes of conduct are adhered to. The rights of any group of aspirant practitioners to be registered should always be weighed against protecting the public through registration.</p>
<p>Q8: Do you have any comments on the outline process for identifying which transfers should transfer?</p>	<p>The GOC registers students and understands that this is not the intention for registers of students to be transferred. We feel that students should be registered and transferred if they are in contact with the specified patient groups and the public are placed at risk.</p>
<p>Q9: What evidence might an organisation holding a voluntary register provide in order to support their submission?</p>	<ul style="list-style-type: none"> • The length of time the register has been in existence, • The training and qualifications attained by practitioners and/or the experience of each practitioner, • Adherence to codes of conducts for its registrants, • Complaints process procedures • A commitment to professional development by its registrants.
<p>Q10: Do you agree that the grandparenting period for psychotherapists and counsellors should be set at two years in length?</p>	<p>Yes. We feel that this will give potential registrants and those not on a voluntary register at present an adequate and appropriate amount of time to apply and attain the necessary standards.</p>
<p>Q11: Do you think that the standards</p>	<p>Yes, we appreciate there is significant</p>

<p>support the recommendation to differentiate between psychotherapists and counsellors?</p>	<p>overlap in the standards between the two professions, though it is important to show a clear distinction in profession specific standards wherever possible.</p>
<p>Q12: Do you think the standards are set at the threshold level for safe and effective practice? If not, why not?</p>	<p>Yes.</p>
<p>Q13: Are the draft standards applicable across modalities and applicable to work with different client groups?</p>	<p>Yes, the wording of the standards is broad enough to cover different modalities and client groups.</p>
<p>Q14: Do you think there are any standards which should be added, amended or removed?</p>	<p>In 1b.4 it would be appropriate to include a standard of “imparting information in a manner appropriate to the service user”.</p>
<p>Q15: 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? (Standard 1b.3)</p>	<p>Yes.</p>
<p>Q16: Do you agree that the threshold educational level for entry to the Register for counsellors should be set at level 5 on the National Qualifications Framework? If not, why not?</p>	<p>Level 5 would seem appropriate for a non graduate profession. The GOC does recognise programmes for Dispensing Optics training (Diploma’s & Foundation Degrees) which are at Level 5 on the NQF. However the requirement for Optometrists it is Level 6 as it is a graduate profession.</p>
<p>Q17: Do you agree that the threshold educational level for entry to the Register for psychotherapists should be set at level 7 on the National Qualifications Framework? If not, why not?</p>	<p>Justification as to why a Masters or Doctorate is required for entry on to the Register rather than an Hons degree would need to support a requirement at Level 7.</p>

Q18: Do you have any comments about the potential impact of the PLG's recommendations and the potential impact of statutory regulation?	Regulation needs to be proportionate to the potential risk to the public and aspirant registrant groups must be properly scrutinised before being registered.
Q19: Do you have any comments about the potential implications of this work on the future regulation of other groups delivering psychological therapies?	No.
Q20: Do you have any further comments?	No.