



## Association of Child Psychotherapists Briefing for the House of Lords

Short debate 2nd March 2020:

### ***Impact of treatment by unregulated and unregistered persons offering psychotherapy or counselling services upon the mental health and wellbeing of their clients***

#### **About the ACP**

The Association of Child Psychotherapists (ACP) is the main professional body for Child and Adolescent Psychoanalytic Psychotherapists in the UK. Child and adolescent psychotherapy is a core NHS profession with members completing a six year training including four years full-time clinical training to doctorate level in NHS child and adolescent mental health services. The ACP is responsible for regulating the training and practice standards of Child and Adolescent Psychoanalytic Psychotherapists and is an accredited register of the Professional Standards Authority (PSA).

#### **Issues the ACP wishes to raise in the debate**

The ACP endorses the detailed points made in the briefing from UKCP, BPC and BACP and we share the concerns they raise that the current regulatory and registration framework is not well understood by the public and may be inadequate to prevent harm to patients from unregulated and unregistered persons offering psychotherapy or counselling services. The ACP wishes to make a number of additional points arising from the work of our members with vulnerable children, young people and families.

1. There are currently two systems for the regulation and registration of healthcare professionals overseen by the PSA. Doctors, nurses, pharmacists, psychologists and allied health professionals are statutorily regulated and use of these titles is protected in order to prevent unregulated practice. Counsellors and psychotherapists, including child and adolescent psychotherapists, are part of the accredited registers programme of the PSA which is a voluntary registration scheme. Whilst the accredited registers programme provides a framework for patient safety and professional standards its voluntary nature allows for unregistered individuals to continue to practice. As there is a significant lack of public awareness of the programme it can be hard for them, as well as some employers, to distinguish between qualified and unqualified counsellors and psychotherapists.
2. It is of great concern to the ACP that there may be individuals practising as child and adolescent psychotherapists who may be unqualified or have very limited and inadequate qualifications. The current voluntary registration does not preclude this and no systems are in place to identify and prevent unregistered practitioners. Child and adolescent psychotherapists registered with the ACP are required to have DBS and safeguarding level 3, in addition to other CPD requirements which are checked annually. Children who may be already vulnerable and seeking mental health treatment could be placed at considerable risk by being seen by unregistered adults who do not have DBS checks or updated safeguarding training.

3. Additionally, the lack of regulation of counselling and psychotherapy titles means that there can be a wide range of individuals using the same title but with very different training, qualifications, skills and competences. Whilst all these practitioners are working within the accredited registers framework, and have an important contribution to make to the health and wellbeing of children, young people and families, the lack of clarity about titles and levels of competences is concerning. The ACP has a very clear set of competences for Child and Adolescent Psychoanalytic Psychotherapists at the point of qualification which is carefully aligned to their work as highly specialist clinicians working in the NHS and other public services with children and young people with severe and complex difficulties, and which are gained through their four-year clinical training in NHS mental health services. The lack of protected titles and limited awareness and understanding of the voluntary registration programme makes it hard for the public and employers to differentiate between the skills and competences of practitioners. A particular concern is the employment of practitioners trained to work with adults being employed in services for children and young people. This practice appears to be increasing in the NHS as services try to address gaps in the workforce.
4. With the planned expansion of the psychological professions workforce to meet the aims of the NHS Long Term Plan and NHS People Plan the ACP's view is that there should be a review of the current systems of regulation and registration to ensure they are proportionate to the risk posed to the public. This should also consider the current inequity between regulated healthcare professions and those on accredited registers. As many of the latter are mental health professionals we see this as an issue of parity of esteem between physical and mental health which the government has a duty to address.

#### Publication and Queries

We are content for this briefing to be made public.

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