

The British Psychological Society

APPLICATION FOR THE REGULATION OF THE PROFESSION OF PSYCHOLOGY BY THE HEALTH PROFESSIONS COUNCIL

4 JUNE 2003

Application by the British Psychological Society: SUMMARY

This application for the regulation of psychology by the Health Professions Council is made by the British Psychological Society, the learned and professional society of all psychologists within the UK.

Psychology meets the 10 criteria in Part B of the assessment as follows:

1. The occupation must cover a discrete area of activity displaying some homogeneity.

All psychologist practitioners have a common basic scientific qualification in psychology plus specialist postgraduate qualifications.

Psychology at undergraduate level in the UK is funded by the HEFCE as a science. All applied psychologists are required to complete a recognised undergraduate degree in psychology which provides the basic scientific knowledge to underpin postgraduate training. Those who do not possess an accredited undergraduate degree are required to show evidence of an overseas qualification that covers the same core components or pass the Society's own Qualifying Examination.

The common basic qualification is typically a single or joint honours degree from a UK university. The Society sets a requirement, defined by the syllabus of the Qualifying Examination, which such degrees must meet in order to be accredited as providing graduates with the Graduate Basis of Registration as a Chartered Psychologist. The Syllabus currently comprises 5 major domains, all of which must be covered to appropriate depth by an accredited first degree.

- 1. Biological foundations and cognitive processes.

 Comprising biological foundation of behaviour; perception learning and memory; and thinking and language.
- 2. Individual differences, social and developmental psychology.

 Comprising personality and intelligence; social psychology; and developmental psychology.
- 3. Research design and quantitative methods in psychology.

 Comprising conceptual research issues; practical research issues; and quantitative methods.
- 4. Integrative and common issues across psychology. This comprises issues across different fields of psychology, e.g. historical, philosophical and theoretical questions about past, present and future developments in psychology; methodological and ethical debates; problems of application; the role of psychology in society.
- 5. Advanced options

Students choose a series of advanced options.

The nine options comprise educational psychology, clinical psychology, occupational psychology, psychology, cognitive psychology, social psychology, developmental psychology, health psychology and cultural psychology.

6. Practical

In addition, students must undertake supervised practical research.

In addition to this common core for all psychological practitioners, specialist postgraduate training of a minimum of 3 years duration, is undertaken. All postgraduate programmes cover specialist areas of expertise, such as Clinical Psychology, Health Psychology, Educational psychology, etc... However all postgraduate awards have core features such as common approaches to ethical practice, a dissertation, minimum resource criteria, etc.... The Society's Membership and Professional Training Board has the responsibility to accredit all postgraduate programmes and ensures consistency between programmes and across specialisms. It also ensures consistency between accredited programmes and the Society's own postgraduate awards which provide the core curriculum standards for accredited programmes.

Overseas trained psychologists must demonstrate possession of overseas qualifications which are of an equivalent nature to UK postgraduate awards or must complete either a top up programme or pass one of the Society's own awards.

All applied psychologists must demonstrate a period of acceptable supervised practice before being entered onto the Register of Chartered Psychologists.

2. The occupation must apply a defined body of knowledge.

Psychology has an extensive and defined body of knowledge found in hundreds of scientific and professional journals and hundreds of thousands of books. Eligibility for registration as a Chartered Psychologist requires successful completion of a minimum 6 year programme of undergraduate and postgraduate education and training at a university in the UK (or equivalent). Such courses must be accredited by the Society.

The Society itself publishes 10 journals and jointly publishes *Evidence Based Mental Health* with the British Medical Association and Royal College of Psychiatrists. Each is a highly regarded, peer reviewed journal with international readership. The American Psychological Association has an even larger list of its journals which number over 40. Many commercial international publishers publish psychology journals (e.g. Carfax, Blackwell), as do other national psychological associations. In addition, there are thousands of books published each year on psychology, ranging from fundamental science to practical applications.

It is this body of scientific and applied knowledge that forms the basis for training in psychology at both undergraduate and postgraduate levels. This is ensured partly because training is primarily within the university system, and hence subject to that sector's quality assurance, and partly by the Society's system of accreditation which requires all courses to be based on this knowledge base.

Psychologists work in several specialist areas:

Clinical Psychologists work within the NHS and privately with people with mental or physical health problems.

Counselling Psychologists work collaboratively with people who largely have difficult life events such as bereavement, relationship and work problems.

Educational Psychologists apply psychology to children and young people, working with those who have learning and behavioural problems, assessing children with special needs, working with teachers and policy development.

Forensic Psychologists are concerned with offending behaviour and are found in the prison service, social services, secure units and the probation service.

Health Psychologists apply psychology to the promotion of health, prevention of illness and the development of health policy.

Occupational Psychologists work with organisations and individuals to consider the work environment, its impact on individuals and the effectiveness of organisations.

Neuropsychologists work with brain injured and brain damaged clients.

Teachers and researchers in psychology can be found in all levels of education and research. They work to train psychologists and other related professions and expand the knowledge base of the discipline.

The Society's Qualifying Examination is based on its Regulations for the Qualifying Examination, which forms the basis for all course accreditation at undergraduate level. In

addition the Society produces criteria for knowledge bases in each of its postgraduate disciplines. It produces Regulations for all its postgraduate Diplomas and Certificates. These criteria also form the basis for course accreditation at postgraduate level.

There are no other unregulated professions which share a common knowledge base with psychology.

3. The occupation must practise based on evidence of efficacy.

Psychology is a scientific discipline and its practice is based upon research evidence. All education and training programmes are required to ensure that those who become eligible to be Chartered Psychologists have demonstrated a high level of competence in research-based practice to Masters or Doctoral level.

The responses to Q1 and 2 demonstrate the scientific basis for psychology. Training in scientific methodology and epistemology starts at undergraduate level and continues throughout postgraduate training. At postgraduate level, all those who qualify are required to demonstrate the necessary level of competence (at Masters or Doctoral level) commensurate with their specialism. Therefore they must demonstrate the necessary knowledge and skills, and ethical appreciation, to be accepted as a psychological practitioner. Hence the requirement for evidence-based practice with demonstrable efficacy is a sine qua non of the preparation of psychologist practitioners.

The Society's Qualifying Examination has a core component that requires research methodology to be taught at undergraduate level and those completing postgraduate programmes must complement this with research techniques related to their specialism within the field of psychology. Therefore, practitioners will have demonstrated evidence based research and practice prior to becoming eligible for Chartered status.

In post registration CPD, most practitioners undertake significant research into developing trends within the profession, drawing on the literature and research published within the profession, of which there is a considerable amount (see 2 above).

There is considerable research evidence that contributes to the continuing development of the profession which is published in the Society's own publications and elsewhere. Much has been funded by academic and public sector sources and is of the highest standard across the UK.

4. The occupation must have at least one established professional body which accounts for a significant proportion of that occupational group.

The British Psychological Society was formed in 1901 and received its Royal Charter in 1965. It is the only body for all psychologists. Membership is currently 36477 of whom 10611 are Registered Chartered Psychologists. The latter represent the majority of those eligible to operate as fully qualified practitioner psychologists.

The Society publishes an Annual Report which comprises 53 pages. This provides information on the extensive range of the Society's activities as well as the (abbreviated) accounts, structure of the Society and the membership figures.

The Society is also a registered charity with a Board of Trustees. These act as the overall governing body for the Society, and are listed in the Annual Report. The Society also has a Representative Council comprising over 50 members representing subsystems and 12 members elected directly by the members. The Trustees, who include the senior officers, also sit on the Council.

The Society's structure of subsystems reflects the range and diversity of the discipline. These include Divisions for those engaged as practitioners (e.g. health psychologists); Sections, for the scientific study of the discipline; and Special Groups. There are also Branches, and some Divisions themselves have subsystems e.g. special interest groups.

The membership of the Divisions is as follows: 4777 Clinical, 3092 Occupational, 1433 Educational and Child, 1353 Counselling, 1015 Health, 1008 Forensic, 628 Neuropsychologists, 351 Teachers and Researchers.

All the Society's Boards, Committees and working groups have defined terms of reference, constituent representatives and are accountable to the Trustees and Representative Council.

Should the profession be required to establish grandparenting criteria then its Boards of Examiners, undergraduate and postgraduate awards would easily be able to fulfil that purpose. The Society has run independent examinations for many years and has models of routes for partially qualified practitioners who do not meet the Society's registration criteria and need additional experience.

The Society is the only body that represents psychologists across the whole range of specialisms and which is the designated authority, recognised by the government, for the purposes of assessing overseas qualifications.

It relies heavily on member time and support with over 800 active members in the process of running all its activities and functions.

5. The occupation must operate a voluntary register(s)

The Society's Royal Charter was amended in 1987 to allow the setting up of a Register of Chartered Psychologists. This voluntary register has operated successfully and, as stated above, there are now 10,611 psychologists on the Register

Entry to the Register is strictly regulated. An applicant must meet the requirements for the branch of psychology in which they practise. All must have the Graduate Basis for Registration. In addition, a minimum of 3 years education and training on a course or programme of study accredited and approved by the Society must be successfully undertaken.

All members of the profession are required to sign up to its Code of Conduct and to accept that allegations of professional misconduct will be investigated by the Society. The profession has been at the forefront of lay input into its regulatory system with two thirds of its Professional Conduct Board being recruited from outside the profession.

The majority of applied psychologists are registered with the Society. In the National Health Service, appointments to psychology posts require membership of the BPS in the vast majority of cases. As a result the Society is confident that around 90% of practising Clinical Psychologists are registered. Similarly, Counselling Psychologists working within the NHS are almost entirely members, although many Counselling Psychologists work solely in the private sector. In the case of Educational and Child Psychologists, estimates of the number of LEA employed psychologists when compared with Society membership suggest that over 50% of all Educational and Child Psychologists are registered. In the case of academic psychologists, a recent survey of Higher Education Institutions by the BPS suggests that 55% of academic staff are members of the BPS, but that survey did not include Further Education Institutions or schools. In the case of other specialist categories, such as occupational psychology, the figures are not as clear but estimates of 50-80% exist for all other categories. These figures exceed the minimum requirement for registration with the HPC.

Three votes of the membership have confirmed, by large majorities, the members' wishes for statutory regulation.

6. The occupation must have defined routes of entry to the profession

All entrants to the profession must have the Graduate Basis of Registration (GBR) normally a 3 year degree in psychology at single or joint honours in a UK university. In addition they must have a minimum of 3 years postgraduate education and training in the relevant sub-discipline which includes practice supervised by registered Chartered Psychologists. This is normally a Masters or Doctoral course at a UK university. All courses for GBR (N=396) and postgraduate training (N=108) are accredited by the Society.

The Society's membership criteria are set out in its Statutes (1-12) and in the Rules (1-15). The Society also publishes leaflets which provide detailed information on the criteria and process. Each Division also has membership criteria.

With respect to Chartered Status, an applicant must meet the requirements of Statute 12.

The Society's Admissions Committee will only admit registrants who have:

- a) demonstrated passes in Society accredited qualifications, or
- b) had their overseas qualifications assessed as being comparable with those accredited in the UK, or
- c) demonstrated passes in the Society's own awards and qualifications

There are mechanisms to support independent routes to registration (through the Society's own awards) and to provide additional requirements for those who partially meet the Society's criteria for registration but require additional experience or training.

The subject of psychology has been benchmarked by the QAA and details can be found at: http://www.qaa.ac.uk/crntwork/benchmark/phase2/psychology.pdf

The Society is also actively working towards establishing National Occupational Standards for each of its specialisms. These will eventually translate into new opportunities for assessing eligibility for registration against the criteria for professional training.

The Royal Charter, Statutes and Rules enable the Society to award the title of Chartered Psychologist, to allow the use of the abbreviation C.Psychol and to award Fellowships and Associate Fellowship. The Charter is designed to protect the public through the control of these titles and the requirement to be a Chartered Psychologist is recognised as being the benchmark across the NHS and other public sector employers.

7. The occupation must have independently assessed entry qualifications.

Entry qualifications are almost always by degrees from UK universities, and are consequently independently assessed and subject to Higher Education quality assurance including external examiners and oversight by the Quality Assurance Agency.

Undergraduate degrees in psychology are subject to both the Society's accreditation procedures and the Quality Assurance Authority's Benchmark standards. All university degrees are also subject to rigorous internal QA procedures as well as external examiner oversight to ensure comparability of standards.

Postgraduate qualifications are also typically provided by universities and are also subject to QAA and the universities' own quality assurance procedures. They also have external examiners.

Hence, qualifications in psychology are subject to independent assessment through the UK's well established Quality Assurance Agency (QAA) as well as universities' own systems. The role of the Society is to ensure that the content of courses also prepares those who graduate for the professional career for which they have trained. All visiting teams to postgraduate courses comprise both academics and practitioners. The Society's Psychology and Education Board and its Membership and Professional Training Board also include academics and practitioners. Practitioners and employers are also involved in the admission to postgraduate training courses.

Currently the Society accredits 108 courses of postgraduate training comprising 31 Clinical, 1 Clinical-Neuro, 9 Counselling, 12 Forensic, 17 Educational, 20 Health and 18 Occupational.

Each has its own criteria for accreditation of courses against which the courses are assessed on a 5 year rolling programme of visits.

In cases where overseas degrees are assessed, the Society uses independent verification from the National Academic Recognition Information Centre, an independent body which validates awards and institutions from around the world.

All overseas registrants must have accredited degrees which cover the subject specialisms within psychology and must provide independent referees as to their professional practice.

8. The occupation must have standards of conduct, performance and ethics.

The Society has a *Code of Conduct, Ethical Principles and Guidelines for Practice* with which all members must comply. Failure to do so may result in investigation by the Society and disciplinary action by its Professional Conduct Board.

The Society's Professional Practice Board is responsible for reviewing and setting criteria for professional practice across the profession. In addition the Society's Ethics Committee issues guidance on ethical matters and works with the regulatory committees to ensure that the highest standards of practice are promulgated amongst the profession.

The Code of Conduct is the primary document, which sets standards and is the basis for any charges which might be brought against a psychologist who is the subject of a complaint. The other sections of the booklet provide specific guidance. In addition, the Society's Divisions provide additional guidance for their members.

The Code of Conduct comprises a Preamble plus 5 sections: General, Competence, Obtaining Consent, Confidentiality, and Personal Conduct.

The remaining sets of guidelines are intended to provide further guidance to psychologists. They include Ethical Principles for Conducting research with Human Participants and Sexual Harassment at Work and the Ethics of Dual Relationships.

All training courses must include training in ethics and professional conduct, using the Society's Code as one important resource.

The Society has also been at the forefront of developing ethical codes for Europe, through the European Federation of Psychologists Associations. With the Society's leadership, EFPA developed a Meta-code of Ethics which has proven most useful for a number of countries, particularly those in Eastern Europe.

9. The occupation must have disciplinary procedures to enforce those standards.

The Society has investigatory and disciplinary procedures defined in the Royal Charter and Statutes which consider complaints against psychologist members. The procedures are formulated and publicly available. All disciplinary hearings are in public, with the case prosecuted on behalf of the Society by legal counsel. Each Conduct Committee which hears a case has a majority of non-psychologists, senior members of other professions who are experienced in disciplinary hearings in their own profession. Outcomes are published. The Society's Annual Report publishes details of disciplinary work carried out by the Society. In addition the Society recently established a Fitness to Practice procedure to deal with members whose health rather than conduct is of concern.

In brief, a complaint will be considered by the Investigatory Committee (IC), chaired by the President and comprising senior psychologists. If the IC decides there is *prima facie* a case to answer, an Investigatory Panel will be set up comprising experienced psychologists with relevant expertise. They report to the IC. The IC may decide to refer the matter to a Conduct Committee, in which case charges are formulated with reference to alleged breaches of the Code of Conduct.

Each Conduct Committee comprises two non-psychologists and one psychologist, who are members of the Professional Conduct Board (PCB). Hearings are held in public and press releases provide information of the charges. Legal counsel prosecutes the case for the Society. The psychologist who is the subject of the complaint may also be represented or accompanied by a friend. The Conduct Committee is advised on points of law by a separate legal counsel. All decisions are published in *The Psychologist*.

It is a fundamental principle of the Society's system that any decision is always made by a majority of non-psychologists, as in the case of the Conduct Committee, or by the non-psychologist chair of the PCB if a proposal not to proceed to a full hearing is made.

The Society has built up important case law. It has also developed very effective collaboration with other professions, some of which are members of the HPC, as senior members of their disciplinary committees sit on the Society's Professional Conduct Board.

The Professional Conduct Board has a full range of sanctions at its disposal, ranging from reprimands, suspensions, the imposition of conditions and removal from the Register or membership of the Society.

The Society has enforced its standard to the ultimate level of removing members from the Register, and from membership, for serious offences.

10. The occupation must require commitment to continuous professional development (CPD)

The Society is committed to CPD and has had a committee to co-ordinate activities since 1988. A CPD policy was approved by a vote of the membership in 2000, which made CPD mandatory for all Chartered Psychologists holding a practising certificate. The Society has also implemented a development project, and appointed a CPD Officer in 2001.

Society CPD practices developed within the Divisions and in 1988 a Standing Committee for CPD was set up to help co-ordinate CPD activities and share best practice. A Society CPD policy was defined following consultation with the membership and in autumn 2000 the membership voted to make CPD mandatory for all Chartered Psychologists holding practising certificates. The resulting change to the Society's Statute 13 was approved by Privy Council in summer 2001.

The Standing Committee for Continuing Professional Development (scCPD) developed a specification for a project to implement mandatory CPD and a CPD Officer was appointed in April 2001 to help take the project forward.

The project has 6 stages:

- 1. Information gathering and mapping existing CPD practice, both internal and external.
- 2. Consultation of CPD model options.
- 3. Revision of model options.
- 4. Trial phase pilot study with a sample of members
- 5. Review and further revision of model
- 6. Implementation

Relevant committee and board Chairs were targeted with information and invited to respond, an article was placed in The Psychologist (Feb 2002), the consultation was published on the Society Website, and a CPD workshop was held at the Society's Annual Conference (March 2002) so that potentially any member would have the opportunity of responding.

Phase 4 (pilot study) commenced at the start of 2003 and it is expected to take 9 months to complete.

The requirement that registrants with the HPC will be required to undertake CPD therefore fits well with the Society's policy for its members.