

Note for the website

The attached letter relates to enclosure 4 of the papers for the Education and Training Committee held on 27 September 2007. It was tabled at the meeting.

Applied Psychologists : Threshold level of qualification for entry to the register

An initial response from the British Psychological Society to the Health Profession Council's Education and Training Committee.



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1. Preamble

The British Psychological Society (the Society) has been invited to submit an initial response to the HPC's proposal to establish the threshold entry route to the proposed statutory register of psychologists at M-level (plus supervised practice). This brief paper sets out a number of key points that the Society wishes to draw to the attention of the Education and Training Committee at its meeting on 27 September 2007. This is not an exhaustive critique.

Since 1987, the Society has operated a voluntary register of Chartered Psychologists. The Royal Charter set the threshold for entry onto the Society's register as three years postgraduate study and practice (or part time equivalent). The external benchmark for the Chartered Psychologist qualification is doctoral level. The proposal from HPC to set the entry threshold to the statutory register at M- level (plus supervised practice) flies in the face of the Society's, and employers', requirements for autonomous, high level practice. This would be a reduction in standards.

The commentary below will use the headings provided in the HPC document for the Education and Training Committee, 27 September 2007.

2. Introduction and Regulation of applied psychologists (p3)

The scope of regulation is wider than described here. As well as those psychologists with 'specialist titles', there are around 2,900 Chartered Psychologists who hold Practising Certificates but do not have a title associated with any particular domain of practice. Therefore the list of psychologists to be regulated needs to include these individuals.

3. About the threshold level (p4-5)

In this section and throughout the document, there is confusion between the title of an academic award and the final level of competency and expertise. The Society's own qualifications (refer to Appendix 1) do not carry an academic degree title but they are set at the level of Chartered Psychologist which requires knowledge, practice skills, cognitive skills and autonomous practice consistent with the D level descriptors. Since either a Society postgraduate qualification or an accredited professional doctorate from an HEI is required for entry to the Society Register, the existing level at which the majority of education and training is delivered is D level.

The Society understands that the entry level for all groups currently registered with HPC was set at the level in operation prior to the registrant group joining the HPC Register. It is therefore especially puzzling as to why the extant registration level for psychologists is not being adopted.

It should be the case that a statutory register should provide at least an equivalent level of public protection to that provided by a voluntary register.

While the Society understands that the HPC feels the need to progress various areas of work in connection with the registration of psychologists, it cannot understand how the HPC can propose an entry level before the Professional Liaison Group has even drafted the necessary Standards of Proficiency for the profession.

To set the entry route at M-level (plus supervised practice) is an immediate reduction in standards. This will impact on the quality of protection provided to the public in that areas of competence currently required will either be omitted or given scant attention. Any diminution in standards of training constitutes a risk to public protection and runs counter to the government's agreement that standards will not be reduced.

The proposal confuses a purely academic qualification with the Society's practitioner qualifications which require both postgraduate academic study and supervised practice that is rigorously assessed.

4. Applied Psychology: Education and training routes (p6-10)

a) Background information (p6-7)

The entry point for the award of Chartered Psychologist (CPsychol) is set at level 12/D in the framework of higher education qualifications, requiring the equivalent in effort, time and achievement of 540 post-graduate credits. This requires candidates to demonstrate a high intellectual level, a range of advanced competencies and sophisticated analytical abilities.

Chartered Psychologists are individuals who are deemed fit to be autonomous practitioners. Eligibility for Chartered Status is achieved through successful completion of a period of study and practice in psychology. The minimum period of study and practice required is 3 years post graduate full-time (or equivalent), following the award of a recognised undergraduate degree in psychology. It had been the Society's expectation that our own post graduate qualifications would be subject to the HPC approvals process in the same manner as cited for the Association of Clinical Scientists.

For those aspiring to be practitioners there are two main routes:

Professional doctorate : The Society currently accredits professional doctorates (N=66) in educational psychology, counselling psychology, forensic psychology, health psychology and clinical psychology. It is not correct to state (p7) that these exist only in a "small number of applied psychology disciplines". Professional Doctorates are available in 5 of the 7 domains of practitioner psychology.

BPS Postgraduate Qualification : A candidate on this route undertakes a Society accredited Masters programme (N=74 accredited programmes in Health, Forensic, Occupational, Educational (Scotland only) and Sports and Exercise) and then take the relevant Society examinations after at least a further two years of supervised and assessed practice. Holders of these Society qualifications have developed and demonstrated competencies consistent with the QAA D level descriptors, which is the entry point for the Register of Chartered Psychologists. The Masters programmes which form part of the training account for a third of the postgraduate training, with the remaining 2 thirds being accounted for by the Stage 2 training.

The national frameworks for higher education qualifications provide an explicit, independent and objective definition of the level of functioning that marks doctoral level and the level required of a Chartered Psychologist. An individual at this level is expected to be able to :

- a make informed judgements on complex issues in specialist fields, often in the absence of complete data, and be able to communicate their ideas and conclusions clearly and effectively to specialist and non-specialist audiences;
- b continue to undertake pure and/or applied research and development at an advanced level, contributing substantially to the development of new techniques, ideas, or approaches;

and will have:

- c the qualities and transferable skills necessary for employment requiring the exercise of personal responsibility and largely autonomous initiative in complex and unpredictable situations, in professional or equivalent environments. (QAA, 2001).

A range of qualifications and credit frameworks exist which may be benchmarked against the *FHEQ*. Level 8 of the *National Qualifications Framework* (Qualifications and Curriculum Authority, 2006) is equivalent to level D of the FHEQ as defined above. This is also consistent with level 12 of the *Scottish Credit and Qualifications Framework* (2001).

The Economic and Social Research Council guidelines on professional doctorates may be helpful here. The Council considers professional doctorates to serve a dual purpose, namely: 'to make a contribution to both theory and practice, and to develop professional practice through making a contribution to (professional) knowledge'. Therefore Chartered Psychologists are not just practitioners but are scientist practitioners and this is what marks them out from those who simply deliver services.

b) Entry routes for applied psychologists (p8-10)

There are a number of factual inaccuracies in these pages that need to be corrected. A corrected version is attached as Appendix I.

One of the key missing pieces of information is that there are accredited doctorates in the domains of clinical, counselling, forensic, health, and educational psychology. Your paper suggests that these only exist for clinical and educational psychology.

5. Proposals for the entry level (p11-12)

The competencies required for registration as a Chartered Psychologist (C.Psychol) have been benchmarked at level 12/D by the Quality Assurance Agency against the PhD and professional doctorates. Again, this decision was based on a comparison of required competencies and is akin to professional doctorates in business and management, education and engineering.

The award of C.Psychol has also been benchmarked against national and international credit and qualifications frameworks which provide explicit, objective and independent comparators.

The Society's standard for Chartered Psychologist status is also congruent with the standard agreed for practitioner psychologists in Europe. This is an agreement brokered by the European Federation of Psychology Associations across 34 European countries.

The Society is very concerned that the paper prepared for the Education and Training Committee contains an important internal contradiction. On the one hand it states that "SET 1 articulates the threshold in terms of an academic level". On the other hand it acknowledges that the standards of education and training should be "necessary threshold standards for safe and effective practice". The paper recognises this as a dilemma: "...in the other disciplines the entry route of MSc plus additional training, study and supervised practice poses the question of which qualification the Council would need to approve". This dilemma (and contradiction) is highlighted in the HPC's own policy and practice: admission to the Register is *de facto* a licence to practice so the standard for admission to the Register must be the standard for safe and effective practice. That standard cannot by definition be solely one based on academic attainment.

The two options put forward in the paper for the entry level re-state the contradiction. On the one hand there is a recognition that safe and effective practice requires "Masters degree for applied psychology or equivalent with further training and experience as appropriate". On the other hand, the paper is reticent to propose Doctoral level on the grounds that "...the Council might be seen to be making a statement that an MSc plus further study, training or experience is equivalent in academic level to a Doctorate". The refusal of the paper to couch the arguments in terms of a professional or practitioner Doctorate or of Doctoral level competencies leads to the wrong recommendation for a threshold level.

The Society's expectation is that our own post graduate qualifications would be subject to the HPC approvals process in the same manner as cited for the Association for Clinical Scientists (p11). On page 12, there is an error in reasoning when it is stated that "...the Council might be seen to be making a statement that an MSc plus further study, training or experience is equivalent in academic level to a Doctorate". HPC would not be approving any Masters degrees since these are not the current entry qualification but only a constituent part of a route towards a Society qualification that is benchmarked at D level/level 12. The HPC approvals process is about entry level i.e. Chartered Psychologist level.

In the final paragraph on this page, reference is made to "variation in education and training routes". While there is such variation, as we have described, there is no variation in the current entry level which is consistent at D level/Level 12 irrespective of route.

6. Recommendations

The BPS cannot accept this recommendation. The existing threshold level, which has been operating for twenty years for the voluntary register, is Chartered Psychologist/D/Level 12.

24 September 2007.

Entry Routes for Applied Psychologists: Corrections

This appendix sets out the factual corrections to the Entry Routes for Applied Psychologists section of the HPC draft paper. The text is copied from the HPC paper, with changes in italic font.

We have suggested some changes to the independent route and professional doctorates section on page 7 as this will save statements which apply to all training routes being repeated under each heading.

For ease of reference, page numbers indicated in the text refer to the page numbers on the HPC draft paper.

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Independent route

1. The BPS accredits postgraduate programmes in each of the applied psychology disciplines.
2. However, in some disciplines an independent route to registration is available. The final qualification is awarded by the BPS but they do not perform the role of an education provider. The independent route involves supervised practice together with the collection of detailed information which demonstrates that certain competencies have been met. *Trainees are required to take responsibility for their own learning and professional development. In most cases the independent route qualifications are in 2 stages. Stage 1 assesses the underpinning knowledge base and some research competencies. An accredited Masters degree will exempt the trainee from the need to undertake Stage 1. Stage 1 is often chosen by trainees who already have an unaccredited Masters degree. Stage 2 consists of structured and assessed supervised practice during which specified competencies must be developed and demonstrated. Successful completion of Stage 2 leads to eligibility to register as a Chartered Psychologist within the relevant domain of practice, although the psychologist will still be required to complete an application.*

All supervised practice contributing to the requirements for registration as a Chartered Psychologist, whether undertaken as part of a Society qualification or an accredited training programme, must be supervised by a Chartered Psychologist from the relevant domain of practice.

Professional doctorates

1. In a *(delete small)* number of applied psychology disciplines, the current entry route is a doctorate. *Accredited Doctoral programmes are currently available in clinical psychology, counselling psychology, health psychology, educational psychology and forensic psychology.*
2. These programmes are normally 'taught' doctorates (sometimes known as 'professional' doctorates) and they differ in terms of structure and content to 'traditional' PhDs. Put simply, a professional doctorate is a doctorate which has been tailored towards a particular profession in terms of content and delivery.
3. The QAA produces a descriptor for doctoral degrees. 'Original research' or 'advanced scholarship' is central to the doctoral level award *descriptor, along with a number of other skills which contribute to the qualities and transferable skills necessary for employment requiring the exercise of personal responsibility and largely autonomous initiative in complex and unpredictable situations, in professional or equivalent environments.*

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Entry routes for applied psychologists

The entry routes in each of the applied psychology disciplines approved by the BPS follow on the next page. Please note: the level of qualification for entry shown below is the minimum level approved by the BPS.

Where the accredited award is not a Doctorate it is limited to the underpinning knowledge component and does not include the practice components required as a preparation for independent practice as a psychologist.

In all cases training must be supervised by a Chartered Psychologist in the relevant domain of practice.

Please note that there are also routes to registration for international applicants and via grandparenting in sports and exercise psychology. This section focuses on the equivalent to the 'UK approved course' route to registration.

• Clinical Psychology

1. The level of entry is 3 year full-time (*or part time equivalent*) doctorate in clinical psychology.
2. The BPS also offers a statement of equivalence in clinical psychology. This allows people who have trained outside of the UK or in another area of applied psychology to become chartered clinical psychologists.
3. The independent route is not open for clinical psychologists.

• Counselling Psychology

1. The level of entry is a three years' full time (*or equivalent part time*) *Doctorate in counselling psychology, or the BPS Qualification in Counselling Psychology*
 2. *This can now be deleted (covered in 1 above). Subsequent numbers have been changed.*
2. The BPS qualification is not a course of study; it is a pattern of evidence requirements and assessments around which trainees create their own training programme. Candidates are supervised in practice by a Chartered Counselling Psychologist and have to provide evidence of meeting certain competencies, dependent upon their prior learning.
3. The level of the university programmes listed as accredited by the BPS range from postgraduate diploma to doctorate. *Where the accredited programme is not a Doctorate a package of accredited programmes will be required to reach the standards required for registration. Any programmes presenting from accreditation since 2005 must be Doctorates.*

• Educational Psychology

1. The level of entry is a 3 year full time (*or equivalent*) doctorate in Educational Psychology.
2. In Scotland, however, this is a 2 year full time Masters degree programme plus one year of supervised practice. Supervision placements are approved and monitored by the BPS Scottish Division of Educational Psychology (SDEP).
3. The independent route is not open for educational psychologists.

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- Forensic Psychology

1. The level of entry is *successful completion of both a stage 1 and a stage 2 programme in forensic psychology. Stage 1 can be either an accredited MSc or Stage 1 of the Society's Diploma and assesses the underpinning knowledge and research dimensions of training. Stage 2 can be an accredited Doctoral programme or Stage 2 of the Society's Diploma and comprises structured and assessed supervised practice during which a range of competencies are developed and assessed.*

- Health Psychology

1. The level of entry is: *successful completion of both a stage 1 and a stage 2 programme in health psychology. Stage 1 can be either an accredited MSc or the Society's Stage 1 Qualification and assesses the underpinning knowledge and research dimensions of training. Stage 2 can be an accredited Doctoral programme or the Society's Stage 2 Qualification and comprises structured and assessed supervised practice during which a range of competencies are developed and assessed.*

- Occupational Psychology

1. The level of entry is either:

a) *For trainees who began their training prior to 1st January 2007, an accredited 1 year full time (or part time equivalent) MSc in occupational psychology plus two years supervised practice; (or the Society's examinations as part of three years supervised practice). In both cases the supervised practice is recorded and assessed against published Guidelines.*

b) *Trainees who began their training after 1st January 2007 are required to complete the Society's Qualification in Occupational Psychology. Stage 1 can be an accredited MSc or Stage 1 of the Society's Qualification and assesses the underpinning knowledge and research dimensions of training. Stage 2 of the Society's Qualification comprises structured and assessed supervised practice during which a range of competencies are developed and assessed.*

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- Sports and Exercise Psychology *(NB: points 1 & 2 have been reversed to improve clarity).*

1. Sports and Exercise Psychology was the most recent applied psychology discipline to be added to those leading to chartered status in 2004. A grandparenting period is currently in operation which allows those who have completed at least 5 years full time sports and exercise psychology practice (or its part time equivalent) to become *Chartered Psychologists*.

2. The current level of entry is a 1 year full time MSc in Sports and Exercise Psychology plus two years' supervised work experience. This is approved/ supervised by the BPS Division of Sports and Exercise Psychology (DSEP).

3. *A Stage two qualification is currently under development and will be launched shortly. This will replace the two years supervised practice currently required and will comprise structured supervised practice during which a range of competencies are developed and assessed.*

End.