

Documents from the front line

This section, an ongoing occasional feature of the journal, is intended to include material of a non-academic, practical and immediate nature, representing ongoing psycho-political process – including manifestos, course handouts, leaflets, petitions, round-robins and ephemera of all kinds. All contributions will be gratefully received.

The Alliance for Counselling and Psychotherapy, UK: Statement of Intent

Many psychotherapists and counsellors are disturbed and unconvinced by current proposals for state regulation through the Health Professions Council (HPC). Over 1700 have already signed a petition to that effect. Many feel that, for the sake of the profession and of their clients, they will be unable to comply with such regulation and will not join the proposed register. This is a message to the entire profession, inviting you to join with us in a cross-modality alliance to fight these plans.

There are a number of reasons for opposition to HPC regulation, which are partly independent of each other: you need not agree with all of them in order to share our concerns about the implications of the proposed system. Here we will offer short summaries of some of the main points at issue; a great deal more detail is available in the references listed at the end.

- The argument *for* regulation by a state-sponsored body has never been made, but is simply assumed. There is no solid research demonstrating widespread abuse by practitioners; nor is there either research or argument to show that such regulation lessens abuse (doctors, for example, have been so regulated for many years, but shocking cases still occur regularly). Yet ‘protection of clients’ is still cited as the main grounds for state regulation. Despite the emphasis on ‘evidence-based practice’ which accompanies the demand for regulation, that demand is itself not evidence-based.
- Although many counsellors and psychotherapists work in medical settings, their work is not a branch of medicine nor an activity ancillary to medicine. Most forms of therapy do not focus exclusively on the relief of symptoms, but emphasise creating and exploring a

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relationship. If there is a goal, it is a general improvement in the quality of life (so that client satisfaction, rather than the improvement of an isolated symptom, is the appropriate measure of effectiveness). Regulation through the HPC implies medical values and criteria which are in many ways antithetical to psychotherapy and counselling.

- A majority of practitioners work full or part time in private practice. Their clients make decisions as responsible adults to come to them and to continue in therapy or to leave, and are able to seek advice or redress from a number of self-regulating professional bodies or from the legal system; they are in effect the practitioner's employer. State regulation is clearly inappropriate for an activity contracted voluntarily between adults. We support extending the private client's autonomy and freedom of choice to NHS and voluntary sector clients, rather than the reverse.
- Many practitioners see their work as more an art than a science: a series of skilled improvisations in a relational context, where each client, and indeed each session, offers unique issues and demands unique responses. Such an activity cannot be captured by a list of 'competences', however elaborate; at best, such a list can offer only a parody of therapeutic practice. Yet regulation by civil servants, who themselves know nothing of the field they are regulating, demands an 'objective' version of our practice, even if this falsifies its nature. The inconvenient reality is that the field consists of many groups and individuals doing *some* of the same things in *some* of the same ways, but with many small and significant differences and with constant invention and variation – which has always driven advances in practice.
- The therapeutic field is a rich and complex ecology, built up of many different approaches. This diversity is intrinsically valuable – since clients and their issues are equally varied – and is part of what we want to protect; however, from a regulatory point of view it is awkward and inconvenient, and needs to be ironed out. Good training helps the practitioner to develop their own unique style of work, rather than making them conform to a supposed 'best practice'. The proposed regulation bids fair to flatten this rich ecology into a monoculture, with devastating consequences for the profession and for its clients.
- Any attempt to impose a quasi-objective framework of standards and competences not only stifles creativity in the field – it also damages the therapeutic work with the client. In trying to apply a predetermined set of external principles to a particular individual, the practitioner must override the client's individuality and sacrifice the therapeutic process to the demands of a fixed technique. This is ethically unacceptable for the practitioner as well as therapeutically ineffective for the client.
- The initiative to regulate psychotherapy and counselling is itself a symptom of our tick-box society: of an obsession with 'safety', a compulsion to monitor every activity, an illusory belief that everything can be brought under control. In many ways, psychotherapy and counselling inherently expose this illusion: they support us in tolerating uncertainty, difference, risk, and the unknown.
- Like many important activities, psychotherapy and counselling, though usually helpful, are inherently 'risky'; they cannot be made to conform to safety-first culture. HPC regulation will only strengthen the existing trend towards defensive practice – that is, practice which is more concerned to protect the practitioner from complaint than to help the client's growth and self-understanding.

- The proposals for HPC regulation cannot be separated from the creation of National Occupational Standards for the field; the recent Skills for Health initiative to determine ‘competences’; NICE clinical guidelines privileging a single form of ‘evidence-based’ therapy over all other modalities; and the so-called Improving Access to Psychological Therapies scheme. Between them, all of these developments promise to reduce access to long-term, relationally oriented therapy and counselling; to reduce client choice; to medicalise the field; and to rigidify training and inflate its cost, and hence the cost of therapy, making access even more difficult for the economically disadvantaged. HPC regulation is also likely to exclude from practice many part-timers and volunteers, as well as making it harder for counselling services using volunteers to survive.
- HPC regulation could only be justified if the benefits could be shown to outweigh the drawbacks. For the reasons cited above, we believe that the damage caused to psychotherapy and counselling will be profound, and the benefits dubious and minor. There are clear alternatives available – some of them in concrete existence in the USA and Australia – which avoid the noxious elements of current proposals; but no effort has been made to examine them.

In this situation we are unable to stay silent. Our political, professional and personal conscience compels us to become guardians of the diversity and independence of psychotherapy and counselling, and to speak out on behalf of our own right to practise ethically and according to our best judgement; of the rich traditions of the discipline and of future generations of practitioners; and also of the clients who might seek to use our services now and in the future – their right of choice and their autonomy and responsibility.

We will therefore do everything we can to oppose HPC regulation, and to alert others to the dangers involved. If these proposals become a reality, we do not expect to be able to consent, and are considering a position of principled non-compliance.

Paul Atkinson, Kevin Baker, Tim Brown, Penny Georgiou, Guy Gladstone, John Gloster-Smith, Richard House, Robert Jenkins, Kevin Jones, Richard Klein, Darian Leader, Roger Litten, Janet Low, Arthur Musgrave, Denis Postle, Werner Prall, Allison Priestman, Richard Reeves, Andrew Samuels, Michael Soth, Joe Suart, Nick Totton, Chris Wilson, Bogdan Wolf, Jason Wright and many others.

Anyone who wants to state their agreement with this document, or who wants to find out more about the Alliance for Counselling and Psychotherapy and the active steps we are taking to oppose HPC regulation, should contact info@allianceforcandp.org.

RESOURCES

<http://www.petitiononline.com/statereg/petition.html>

A petition against HPC regulation, currently signed by nearly 1300 practitioners

<http://ipnosis.postle.net>

A website packed with information and opinion undermining the basis for HPC regulation. This is the first place to look if you want to know more about the statements above.

<http://hpcwatchdog.blogspot.com>

Monitoring how the Health Professions Council operates in practice.

<http://www.pschoanalysis-cpuk.org>

The College of Psychoanalysts is a professional body for psychoanalytic practitioners in the United Kingdom.

<http://psychoanalyticconsortium.org/>

The Psychoanalytic Consortium is a network of psychoanalytic groups founded with the aim of keeping the spirit of psychoanalysis alive in a culture that tends to favour quick-fix solutions and a simplistic conception of our inner lives.

The Great Psychotherapy Debate: Models, Methods, and Findings – Bruce Wampold (Routledge)

A hard-hitting analysis of research, which among other things shows the irrelevance of the medical model to therapy and counselling.

Regulating the Psychological Therapies: From Taxonomy to Taxidermy – Denis Postle (PCCS Books)

Collected papers and articles critiquing state/statutory regulation and suggesting alternative possibilities.

Implausible Professions: Arguments for Pluralism and Autonomy in Psychotherapy and Counselling – ed. Richard House and Nick Totton (PCCS Books)

A collection of work by many different authors from different modalities.

The Regulation of Psychotherapists – Daniel B Hogan (Ballinger)

A classic, four-volume analysis of research and experience, which comes down firmly against HPC-style regulation. Never refuted, little discussed by the supporters of state/statutory regulation.

The Case Against Psychotherapy Registration – Richard Mowbray (Trans Marginal Press)

A prophetic book, now 14 years old, from a growth movement perspective, which gives a thorough summary of Hogan's work.

Psychoanalytic Practice and State Regulation – ed. Ian Parker and Simona Revelli (Karnac)

A recent compilation of arguments.