

Health Care and Associated Professions (Miscellaneous Amendments) No 2 Order 2008

Consultation Questions

Please fill in and/or tick the appropriate response.

Response form

Sonia Sharp, Strategic Director of Children and Young People's Services
at Rotherham Metropolitan Borough Council, on behalf of ADCS

The Association of Directors of Children's Services (ADCS)
Ellen Wilkinson Building
University of Manchester
Oxford Road
Manchester
M13 9PL

0161 275 8809

Robert.belli@adcs.org.uk

The information you send us may need to be passed on to colleagues within the UK Health Departments and/or published in a summary of responses to this consultation.

I do not wish my response to be passed to other UK Health Departments

I do not wish my response to be published in a summary of responses

Please indicate all the countries to which your comments relate:

UK-wide *and/or*

England *Northern Ireland*

Scotland *Wales*

Are you responding: - *on behalf of an organisation*

If you are responding as a member of the public, please supply the following details:

Profession

If you are responding as a health or social care professional, please supply the following details:

Profession

Country of qualification

Please indicate as appropriate:

UK

Other EEA

Rest of World

Area of work

NHS

Social Care

Private Health

Voluntary

Regulatory Body

Professional Body

Education

Union

Local Authority

Trade Body

Other (please give details)

If you are responding on behalf of an organisation, please supply the following details:

NHS

Social Care

Private Health

Voluntary

Regulatory Body

Professional Body

Education

Union

Local Authority

Trade Body

Other (please give details)

The Association of Directors of Children's Services

Consultation Questions

Practitioner Psychologists

Q1. Do you agree that practitioner psychologists should be statutorily regulated?

Agree (x)

Disagree ()

Unsure ()

Comments

We agree that it is important for public protection that psychologists should be statutorily regulated, however we are concerned that the approach set out in the consultation document is based upon a medical model which may not be fully applicable or sensitive to the psychological profession. The language used is medical (eg. suggesting that diagnosis and treatment are synonymous with ‘assessment and integration’) and does not inspire confidence that the HPC will be best placed to regulate the profession.

Q2. Do you agree that psychologists and teachers working exclusively in the furtherance of psychological knowledge should not be statutorily regulated as practitioner psychologists?

Agree (x)

Disagree ()

Unsure ()

Comments

Q3. Do you agree that others who deliver psychological therapies should not be dealt with in this Order but should be statutorily regulated in a future Order when standards appropriate to their roles have been agreed?

Agree ()

Disagree (x)

Unsure ()

Comments

The public do not necessarily distinguish between psychologists and ‘deliverers of psychological therapies’ and we would prefer a comprehensive approach to regulation.

Q4. Do you agree that all seven domains should be statutorily regulated by HPC? If not, which domains should not?

Agree ()

Disagree (x)

Unsure ()

Comments

We believe that all psychologists who offer services to the public should be regulated, although we are not sure that the HPC is best placed to do so.

Q5 Do you agree with the descriptions of the seven domains in Annex B? If not, what alterations would you recommend?

Agree ()

Disagree (x)

Unsure ()

Comments

In the main, the domains seem fairly comprehensive. In relation to educational psychology, there needs to be more emphasis on work with families and in communities as well as organisational development/change management work with schools and other learning settings. It would be helpful if reference is made to the changing context of children’s services following Every Child Matters as this is leading to changes in practice across all professional groups who work with children, young people and their families and it is very important that the domains are sufficiently flexible to accommodate such developments.

Q6. Do you agree that holders of BPS practising certificates who do not meet the full range of competences for one of the seven domains of psychology practice should be eligible for HPC registration and continuing practice only if they demonstrate they meet HPC standards for safe and effective practice, undergoing additional training if necessary?

Agree ()

Disagree (x)

Unsure ()

Comments

Our understanding is that the current BPS systems for regulation ensure that holders of practising certificates a) meet the requirements for registration and b) maintain current professional development so therefore we fear that the introduction of a retrospective check on each psychologist would distract from service delivery in a significant and extremely disruptive way. We believe that all new entrants should be appropriately vetted.

Q7. Do you agree that standards to protect the public should cover conduct, competences and education and training?

Agree (x)

Disagree ()

Unsure ()

Comments

--

Q8. Do you agree that practitioner psychologists should need to have at least three years' undergraduate education in psychology accredited by the BPS for the Graduate Basis for Registration plus three years or equivalent postgraduate education and training?

Agree (x)

Disagree ()

Unsure ()

Comments

Q9. Do you agree that partnership working between HPC, the profession and the public is the right way to design standards of proficiency for this profession?

Agree ()

Disagree (x)

Unsure ()

Comments

We are not convinced that the HPC are the best body to undertake the statutory regulation of psychologists and would prefer that a new regulatory body for the psychological profession is established, building on the knowledge and experience of the British Psychological Society. We agree that whoever the regulatory body is, they should work closely with the profession and the public, including children and young people.

Q10. Do you agree that standards of proficiency, education and training should be derived from competences necessary for safe and effective practice?

Agree (x)

Disagree ()

Unsure ()

Comments

Although we agree with this, we are concerned that the HPC approach is at odds with the context and requirements of high quality, safe psychological practice.

Q11. Do you agree that the regulator should have discretion as to how it obtains professional expertise to carry out professional education accreditation?

Agree ()

Disagree (x)

Unsure ()

Comments

The regulatory body must maintain strong links with the professional bodies who are well placed to fully understand the requirements of service delivery, both now and in the evolving world of Children's Trusts.

Q12. Do you agree that some academic and research psychologists should be allowed to use protected titles without committing an offence?

Agree (x)

Disagree ()

Unsure ()

Comments

Q13. Do you agree with the proposed protected titles? If not, what others would you suggest?

Agree ()

Disagree (x)

Unsure ()

Comments

We already have an established system of describing psychologists and are concerned that the move away from a single title may be confusing to the public.

Q14. Do you agree with adding appearance on a barred list to the grounds for which a health professional's fitness to practise should be considered to be impaired?

Agree (x)

Disagree ()

Unsure ()

Comments

Q15. Do you agree with the proposed set of changes to the Safeguarding Vulnerable Groups Act 2006?

Agree (x)

Disagree ()

Unsure ()

Comments

Q16. Do you agree with the proposed supplementary measures relating to the Protection of Vulnerable Groups (Scotland) Act 2007?

Agree (x)

Disagree ()

Unsure ()

Comments

Amendments to the Dentist Act 1984

Q17. Do you support having, as a main objective for the General Dental Council, as with other regulators, a provision giving greater emphasis to the importance of public protection?

Agree ()

Disagree ()

Unsure ()

Comments

Q18. Do you agree with the requirement that GDC should have proper regard for the interests of people using or needing the services of dentists and dental care professionals, and proper regard for the differing interests of different categories of their registrants?

Agree ()

Disagree ()

Unsure ()

Comments

Q19. Do you agree that the GDC should have the option of engaging other bodies to assist it with these appointment functions?

Agree ()

Disagree ()

Unsure ()

Comments

Q20. Do you agree that the changes to these duties will improve the co-operation and co-ordination between professional regulators and key stakeholders?

Agree ()

Disagree ()

Unsure ()

Comments

Q21. Do you agree that Parliament should play an enhanced role in relation to the monitoring of the General Dental Council, facilitated by the improved arrangements for notification of information relating to its past and future activities?

Agree ()

Disagree ()

Unsure ()

Comments

Q22. Do you agree that the GDC, in common with all regulators of health care professionals, should be under a legal duty to maintain a register of the private interests of its members?

Agree ()

Disagree ()

Unsure ()

Comments

Q23. Do you agree with the strategy for standardising the order and rule making powers of the GDC, and with the move towards giving it greater flexibility over internal “process” issues?

Agree ()

Disagree ()

Unsure ()

Comments

Q24. Do you agree with the new, more flexible arrangements for establishing the constitution of the GDC

Agree ()

Disagree ()

Unsure ()

Comments

Amendments to the Health Professions Order 2001

Q25. Do you support having as a main objective for the Health Professions Council a provision giving greater emphasis to the importance of public protection?

Agree **(x)**

Disagree **()**

Unsure **()**

Comments

Q26. Do you agree that these duties will improve the co-operation and co-ordination between the HPC and key stakeholders?

Agree **()**

Disagree **(x)**

Unsure **()**

Comments

It will be vital that the HPC pay due regard to the BPS, as this is a body with a Royal Charter established to promote quality and development of the discipline on behalf of the country.

Q27. Do you agree with the strategy for standardising the order and rule making powers of the HPC, and with the move towards giving it greater flexibility over internal “process” issues?

Agree **(x)**

Disagree ()

Unsure ()

Comments

Q28. Do you agree that the UK and Scottish Parliaments should play an enhanced role in relation to the monitoring of the Health Professions Council, facilitated by the improved arrangements for notification of information relating to its past and future activities?

Agree (x)

Disagree ()

Unsure ()

Comments

Q29. Do you agree with the new, more flexible arrangements for establishing the constitution of the HPC?

Agree (x)

Disagree ()

Unsure ()

Comments

Amendments to the Pharmacists and Pharmacy Technicians Order

Q30. Do you support having, as a main objective of the Society, a provision giving greater emphasis to the importance of public protection and well-being?

Agree ()

Disagree ()

Unsure ()

Comments

Q31. Do you agree that these duties will improve the co-operation and co-ordination between professional regulators and key stakeholders?

Agree ()

Disagree ()

Unsure ()

Comments

Q32. Do you agree that the UK and Scottish Parliaments should play an enhanced role in relation to the monitoring of the Health Professions Council, facilitated by the improved arrangements for notification of information relating to its past and future activities?

Agree ()

Disagree ()

Unsure ()

Comments

Q33. Do you agree that the RPSGB should be given reserve powers to register suitably experienced people, and allow additional pharmacists to act as prescribers, during an emergency?

Agree ()

Disagree ()

Unsure ()

Comments

Q34. Do you agree with the strategy for standardizing the order and rule making powers of the Society, and with the move towards giving it greater flexibility over internal “process” issues?

Agree ()

Disagree ()

Unsure ()

Comments