
Consultation on criteria for applications for admission to the Practitioner Psychologists part of the Register made under the Transitional (“Grandparenting”) Arrangements

Responses to the consultation and our decisions

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UPDATED DRAFT FOR DISCUSSION / APPROVAL

Introduction

We are consulted between 2 April 2009 and 8 May 2009 on proposed criteria for applications for admission to the practitioner psychologists part of the Register under the ‘grandparenting’ arrangements (referred to in this document as ‘grandparenting criteria’).

Practitioner psychologists

In March 2009, The Health Care and Associated Professions (Miscellaneous Amendments and Practitioner Psychologists) Order 2009 was laid before the Scottish and UK parliaments. This is an Order made under Section 60 of the Health Act 1999 (a ‘Section 60 Order’).¹ This Order was recently successfully approved by both houses of parliament in Westminster and by the Scottish parliament. The Section 60 Order amends the Health Professions Order 2001 to bring practitioner psychologists into statutory regulation by the HPC. The domains of psychology practice to be regulated are:

- Clinical psychologists
- Counselling psychologists
- Educational psychologists
- Forensic psychologists
- Health psychologists
- Occupational psychologists
- Sport and Exercise psychologists

About grandparenting

When the Register for practitioner psychologists opens, there will be a one-off transfer of Registers from the British Psychological Society (BPS) and the Association of Educational Psychologists (AEP).² We will then write to all those who have transferred to ask them to renew their registration and pay the relevant registration fee.

We will also approve all those programmes which led to membership of one of the registers that transfer (known as ‘approved programmes’). This means that any individual who could have been a member of the voluntary register on the date of the transfer, but was not (for example, their membership had lapsed) would be able to apply to us for registration via the UK-approved course route. This also means that someone who is part way through their training when the Register opens will be able to apply to us for registration when they successfully complete their programme.

Whenever a new profession becomes regulated, and titles are protected, there will be a ‘grandparenting’ period. The grandparenting period allows people who have previously been practising the profession, but who do not hold an approved qualification, to become registered if they can demonstrate they meet certain criteria.

¹ The Health Care and Associated Professions (Miscellaneous Amendments and Practitioner Psychologists) Order 2009

www.opsi.gov.uk/si/si2009/draft/pdf/ukdsi_9780111474907_en.pdf

² The Registers that will transfer are defined in the Section 60 Order.

Applications are assessed on an individual basis by registration assessors, who are appropriately qualified members of the profession. In the case of practitioner psychologists, the registration assessors considering each application would be from the same domain as the application being made.

Subject to parliamentary approval of the Section 60 Order, the grandparenting period for practitioner psychologists will be three years in length. Once the grandparenting period closes, the only route to registration for UK trained individuals is via completing an approved programme.

The grandparenting provisions are set out in Article 13(2) of the Health Professions Order 2001 and described in the attached draft document.

Grandparenting criteria

We enclosed the draft criteria that we propose to have regard to in determining whether a grandparenting applicant satisfies the requirements of Article 13(2).

They describe how we will decide whether we can register an applicant, including the information an applicant will be required to submit.

About the consultation

We normally consult for three months in accordance with guidance set out in the HM Government Code of Practice on Consultation. However, as set out in the consultation document, in order to ensure that the grandparenting criteria are agreed (subject to parliamentary approval of the Section 60 Order) in time for the anticipated opening date of the Register, we consulted for a shorter period.

Analysing your responses

Now that the consultation has ended, we have analysed all the responses we received.

We carefully considered each response we received, taking into account whether similar comments were made by other respondents.

In this document, we refer to the paragraph numbering in the consultation draft of the criteria.

Consultation responses

In this section we outline the general comments received in response to the consultation and then the more specific comments we received about the draft criteria.

General comments

- **The principle of grandparenting**

A small number of respondents commented on the principle of grandparenting. The Association of Heads of Psychology Departments (AHPD) said that they were ‘...broadly supportive of the HPC’s grandparenting proposals’ recognising grandparenting as a ‘...sensible provision that existing practising psychologists can continue to work lawfully’. The British Psychological Society (BPS) said that they understood and accepted the principle of grandparenting but said that there existed a view that: ‘...reopening grandparenting in the context of the HPC’s register will undermine all the work that has been carried out, under the voluntary system of registration, to ensure a high standard of education and training for psychologists in the interests of public protection.’

The BPS Division of Occupational Psychology wanted to ensure that the grandparenting arrangements provided reasonable opportunity for practitioners in the field to register. They expressed concern at the time-limited nature of the three year period, suggesting a period of six years would be more preferable. In particular, they felt that this period of time would place too great a demand on practitioners with other ‘multiple and competing commitments’ and disadvantage those who had not completed a first degree in psychology and who therefore would need to undertake further academic study prior to registration.

- **Psychologists without divisional membership**

Two respondents commented on the status of those psychologists who may hold a BPS practising certificate but who are not eligible to hold BPS divisional membership. They expressed disappointment that regulation was going ahead on the basis of seven domains of practice with seven associated adjectival titles, and that other psychologists who did not fall into these groups would not be regulated.

One of these individuals asked what the status would be of a chartered psychologist who was not registered via grandparenting; and whether the criteria for grandparenting would recognise the value of being awarded a BPS practising certificate, even if divisional membership was not held.

- **Clinical Associates in Applied Psychology**

The University of Stirling and the University of Dundee said that they wanted to make a case for the proposed grandparenting arrangements to provide a mechanism by which Clinical Associates in Applied Psychology, a role that exists in the National Health Service in Scotland, could be registered via grandparenting.

In their response, they outlined the history of the development of this role, including masters level training. The role of such training was, they said, to produce a worker who was ‘...equipped with the knowledge and skills to become a safe, efficient and effective practitioner that would be able to deliver evidence-based psychological therapies where the demand was greatest and in a way that would increase access to those therapies...’ They said that they believed that it was ‘...both highly desirable and necessary for the existing workforce to be regulated by the Health Professions Council through any grandparenting arrangements’.

- **Individual domains**

A small number of respondents provided additional information relating to the development and existing profile of specific domains, highlighting ‘contextual issues’ that they said we should take into account.

Three respondents, including the BPS, said that the number of applications in the domain of clinical psychology was likely to be very small because:

- all clinical psychologists posts in the National Health Service (NHS) have required eligibility for chartered status with the Society, demonstrated by having completed a Society-accredited programme or, if trained overseas, having undertaken the Statement of Equivalence;
- there are no training providers within the UK that offer postgraduate qualifications in clinical psychology other than those accredited by the BPS; and
- there has only ever been one register of clinical psychologists in the UK maintained by the BPS.

The BPS also described the context in health psychology, outlining that the Division of Health Psychology has recently closed its grandparenting route; that there are no training providers within the UK that offer postgraduate training in health psychology other than those accredited by the BPS; and that there has only ever been a register of health psychologists in the UK maintained by the BPS.

We were asked to take these contexts into account when scrutinising applications made via the grandparenting route to registration.

- **Other comments**

An individual respondent asked who would decide on the additional learning required by an applicant; and whether there would be some kind of arbitration to ensure that any additional learning specified was reasonable.

Our comments

A 'transitional' period of registration is necessary when introducing statutory regulation. This might be introducing regulation of a profession for the first time or alternatively moving from a voluntary model to a model of compulsory registration. This transitional period is known as 'grandparenting'.

During the grandparenting period, individuals not eligible to be members of the voluntary register can apply for registration. The period is temporary and time limited. After this period only those who hold a qualification approved by the regulator can be registered.

The provisions for grandparenting are outlined in the Health Professions Order 2001. In the past, the grandparenting period has been for two years. However, the grandparenting period for practitioner psychologists will be set at three years. The time period for grandparenting applications is set in legislation and therefore the HPC has no discretion in extending this period.

A general point was made about time for applicants to undertake further training and who would decide on the additional learning an applicant might require. It is important to note that grandparenting is about recognising the 'acquired rights' of a small number of practitioners who are already in practice but who do not hold an approved qualification which would allow them to register. The grandparenting process provides a means by which individual applications from these individuals can be received and assessed and a decision made about registration. The process is not designed to place requirements on applicants regarding additional training and experience. However, in the event that an application is rejected, we would provide a clear explanation as to why which might help guide an applicant as to the additional training to experience they might undertake in order to support a further application, should they wish to reapply.

For the avoidance of any confusion, the two grandparenting routes as outlined in paragraph 2 of the draft criteria and in Articles 13 (2) (a) and 13 (2) (b) of the Health Professions Order 2001 are:

Route A:

- An applicant has to demonstrate that they have been practising their profession (for practitioner psychologists, relating to one or more of the domains of psychology practice) for a period of three out of the five years (or its part time equivalent) before the opening of the Register.
- They have to demonstrate that they have been practising lawfully, safely and effectively (within the area or areas in which they practise)
- The HPC can have regard to the standards of proficiency for the profession. However, applicants do not have to demonstrate that they meet **all** of the standards of proficiency published as being necessary for admission to the Register.

Route B:

- Applies to a person who has been in practice for less than three out of the five years prior to the opening of the Register (or its part time equivalent).
- They have to demonstrate, through any education and training they have undertaken, as well as their experience, that they meet the standards of profession for the profession.

We were asked what the status would be of a chartered psychologist who was not registered via grandparenting. Seven domains of practitioner psychologists will be regulated, each with an associated protected title – e.g. clinical psychologist, forensic psychologist. However, the title ‘psychologist’ on its own will not be protected. Someone who wished to use one of the protected titles would need to be registered with us. However, other individuals who use the title ‘psychologist’ may choose not to register or may not need to register, for example, those who work in research or experimental fields of psychology. These groups of individuals would be unaffected. Someone applying via grandparenting who was Chartered with the British Psychological Society with a practising certificate but who was ineligible for divisional membership (and therefore did not hold an approved qualification) could provide information about this, which might contribute towards a decision about lawful practice (paragraph 6A refers).

In order to be eligible to apply via grandparenting, an applicant has to demonstrate that they have been practising the profession for which they are applying. For example, that they have been practising as a clinical psychologist if they are applying for registration as a clinical psychologist. The grandparenting process is about the ‘acquired rights’ of existing practitioners and should not be seen as a means for practitioners in similar or related fields to gain registration. In the 2007 White Paper, Trust, Assurance and Safety – The Regulation of Health Professionals in the 21st Century, psychotherapists, counsellors and other psychologists were identified as further priority groups for regulation. Work is currently ongoing to explore and make recommendations about the regulation of the first two of these groups. The group ‘other psychological therapists’ is likely to include others delivering psychological therapy, such as graduate mental health workers and associate psychologists.

Introduction (paragraphs 1 to 4)

These paragraphs introduce the legal background to grandparenting including outlining the application routes ‘A’ and ‘B’ as outlined in Articles 13 (2) (a) and 13 (2) (b) of the Health Professions Order 2001.

- A small number of respondents said that the ‘A’ and ‘B’ criteria were ambiguous and that additional guidance would be needed both for applicants and those undertaking the assessment process.
- One respondent said that it would be helpful to include here:
 - the definition of equivalent part time practice;
 - the definition of ‘wholly’ or ‘mainly’;
 - that someone who has been using the title before the opening of the grandparenting period can continue to do so during the 3 year period or until their application is rejected; and
 - that route A applicants will not need to demonstrate the full range of the Standards of Proficiency, in contrast with route B applicants
- The BPS Division of Occupational Psychology made the following general points (some of which are also relevant to other areas of the criteria) with specific reference to Route A:
 - The HPC should clarify the requirements for determining the time required in practice.
 - Supporting evidence such as ‘witness testimony’ from the BPS or employer verification should be required in order to demonstrate length of time in practice.
 - The special circumstances of those who are members of the professional body but are ‘ineligible’ for registration under the current legislation should be recognised.
- The BPS Division of Occupational Psychology made the following general points (some of which are also relevant to other areas of the criteria) with specific reference to Route B:
 - The HPC should seek input from the Division of Occupational Psychology Board of Assessors and Training Committee; the process should be seen as credible and fair.
 - The burden of proof should rest with the individual and the regulator should ensure consistency and fairness whilst ensuring that requirements are not unreasonable.
 - Professional assured supervised practice is central to determining professional competence to practise independently and should be included in Route A and Route B.
 - The Register might use annotations to reflect the restricted or specified range of practice.

Our comments

- The draft grandparenting criteria is a procedural document, setting out in broad terms some of the factors which will be taken into account in determining the outcome of applications via grandparenting. It is not used as guidance for applicants or assessors. The document is set out in broad terms to reflect that the Committee will consider all available information, including the types described in the criteria, in reaching a decision about each application. It is important that the criteria are written in terms which do not fetter our discretion in considering applications.
- The application forms and supporting guidance notes for grandparenting applications are currently being prepared and will include full information for applicants about the process and the information we expect to receive from them. Many of the points raised here and in relation to other areas of the criteria would usefully be covered in such guidance and we will use the comments we receive to inform this guidance.
- In relation the specific points raised by an individual respondent:
 - For the purposes of Route A applications, we consider that wholly or mainly engaged constitutes approximately 35 hours per week; and for part time, 16 hours per week. ‘Equivalent on a part time basis’ would mean that an applicant working part time would have to demonstrate a longer period of practice – i.e. approximately six out of the ten years before the opening of the Register, rather than ‘three out of five’. However, as some applicants will have practised a combination of both part and full time, it is important that this is considered on an individual basis.
 - Someone who has been using a protected title prior to the opening of the Register, can continue to do so until the end of the grandparenting or, if an application is made, until a final decision is reached on that application (including any appeal they may make).
 - The requirements for Routes A and B are stated in paragraph 6A and restated on pages 6 and 7 of this document.
- It is important that the decisions reached in respect of grandparenting applicants are seen to be fair and impartial, and the HPC must reach its own informed and reasoned decision about each application.

Lawful practice and its duration (paragraphs 6 to 8)

These paragraphs explain some of the factors that the Education and Training Committee ('the Committee') will have regard to in determining the lawful practice of an applicant and its duration.

Paragraph 6A

This paragraph provides that the Committee may have regard to whether an applicant has been included in the Register of any regulatory or professional body for the relevant profession.

- The BPS queried how it could be established whether an individual had engaged in lawful and safe practice if they had 'chosen not to be part of a professional body where these aspects of practice would have been regulated'. A small number of other respondents commented that the only relevant Register in this case would be the BPS Register of Chartered Psychologists.

Our comments

- It is important to note here that at present it is not a legal requirement for someone to be a member of a professional body or registered with any other organisation in order to practise as a practitioner psychologist. In demonstrating lawful practice and its duration, the Committee may, however, consider positively any membership held by the applicant.
- For example, some applicants via grandparenting may provide evidence of being Chartered with the BPS and holding a practising certificate as evidence in this area.

Paragraph 6B

This paragraph provides that the Committee may have regard to whether the applicant has maintained professional indemnity insurance.

- The BPS noted that many practitioners employed by organisations will not necessarily have personal indemnity insurance because their practice was covered by their employers' insurance. They said that this demonstrated the need for clear guidance for candidates to avoid 'the potential for unequal treatment'.
- The BPS Division of Occupational Psychology said that it should be clear that this was optional otherwise some occupational psychologists would not satisfy this requirement.

Our comments

- The criteria states that ‘...the Committee shall have regard to, among other matters, the period during which the applicant...[B] has maintained professional indemnity insurance in respect of the practise of that profession’ in determining lawful practice and its duration.
- We recognise that some individuals will be covered by their employers’ liability insurance and that there is, in any event, no statutory requirement that psychologists should hold professional indemnity insurance. The criteria is clear that this is only one matter that the Committee will ‘have regard to’ in reaching its decision. Evidence of indemnity cover can provide positive evidence towards reaching a decision in this area, but the fact that an applicant does not hold cover will not be interpreted negatively in the assessment process. The guidance notes will explain this area very clearly.

Paragraph 7

This paragraph explains that a statement of professional status, which might be provided by an applicant (paragraph 6C refers), is a statement as to the practise of the individual which can be given by a range of professionals.

- An individual asked that we add academics to the list of groups that could act as a referee.
- The BPS Division of Occupational Psychology said that they wanted to include the term Registered psychologist alongside the range of other professionals who can provide a statement or professional status. They also said: ‘In the interest of maintaining professional standards, and for the public and professions to perceive them as credible, we believe that it is important the statements of professional status are not provided by non-psychologists.’
- The Association of Scottish Principle Educational Psychologists (ASPEP) and the BPS were concerned that a person who might have no knowledge of the practice of psychology could be given responsibility to confirm their professional status. The BPS said that a non-psychologist was unlikely to know enough about the different domains of psychology practice in order to make an informed judgement.

Our comments

- The draft criteria is clear that the purpose of a statement of professional status is not to attest to the competence of a practitioner or whether their practise has been safe or effective but is to provide evidence of the duration of practice.

- We consider that, in the majority of cases, it is likely that applicants will provide a reference from a professional colleague. However, the list of potential referees given here is in line with separate requirements for character references as part of the overall application process, and consistent with references provided for other purposes, such as passport applications. We will amend this section to make it clearer – a reference can be given by anybody with standing in the community; the list of potential referees is not exhaustive.
- We believe that in some circumstances, non-psychologists may be in a position to attest to length of practice, as one piece of evidence to be considered. In assessing an application, we would take into account this information, as well as the other pieces of information provided, in determining both length of practice, and whether that practise was in the domain or domains to which the applicant was applying.
- It was suggested that ‘registered psychologist’ might be added as one of the groups that could provide a reference. The term ‘registered health professional’ in the guidance relates to those who are registered with the HPC, or with one of the other regulators (e.g. General Optical Council). After 1 July 2009 this will include practitioner psychologists. We will amend this wording to read ‘HPC registered professional’ in order to make this clear.

Paragraph 8

Paragraph 8 of the draft criteria referred to practise outside of the United Kingdom and a small number of respondents referred to this in their response.

- An individual respondent said that the legal requirements for practice and the definition of clinical psychology varied around the world, and even within the same country. The respondent concluded: ‘I would...strongly argue that psychologists who have trained overseas should not be considered via the grandparenting route but via the HPC’s normal international procedures.’
- The AHPD made similar comments and said: ‘There is a concern here that this provision would allow the grandparenting of people who would not in the past have been eligible for BPS Chartering and might thus contribute to systematic lowering of standards...We believe that overseas applicants need to be assessed using a procedure other than this grandparenting route.’ The BPS agreed, concluding: ‘We do not consider the grandparenting criteria lend themselves to the assessment of overseas-trained psychologists.’

Our comments

- The HPC has a separate international process for assessing applicants who qualified overseas. In most circumstances, international qualified applicants would be directed to this process as the appropriate route for application.

- However, grandparenting is about the acquired rights of existing practitioners and there may be practitioners already in practise in the UK who hold overseas qualifications or for whom part of their experience or education and training was gained outside of the UK. For example, we have been contacted by a small number of practitioner psychologists who qualified overseas, have been employed and have practised as a practitioner psychologist in the UK for a number of years but who do not hold an approved qualification. These individuals would be eligible to apply via the grandparenting route as they would hold ‘acquired rights’ as existing practitioners in the field.

Safe practice (paragraph 9)

This paragraph sets out some of the matters the Committee will have regard to in determining whether an applicant has practised the profession safely.

- An individual respondent described the provisions of paragraph 9, subparagraphs A to C, as ‘very limited’ indeed. They described how each of these headings may not apply if someone is not a member of a professional body, if they do not hold indemnity insurance, and that the likelihood of civil proceedings may be limited. They suggested that it might be that criterion 17 relating to further information may need to be used here to gather sufficient information, and suggested that the refusal of an applicant to consent to information being gathered from external sources might be a ground for rejecting an application.
- The BPS said that the provisions here ‘set the bar too high’ and risked unequal treatment of applicants. They said that individuals who had chosen to be a member of a professional body may be judged more harshly than those who had chosen not to, as they had subjected themselves to a complaints process. The BPS Division of Occupational Psychology echoed these comments, saying that only upheld complaints should be taken into account.

Our comments

- We understand the concerns expressed about the criteria for determining safe practice. However, the criteria are clear that these are matters that the Committee shall ‘among other matters’ have regard to. Information drawn from each of these headings may provide positive evidence of safe practice, but the application will need to be considered in its entirety and an informed judgement reached. For example, information provided elsewhere, perhaps in the case studies provided by the applicant, might also provide evidence of safe practice or evidence to the contrary. Therefore each ‘heading’ will be considered on the basis of all the information provided in the application, not just the specific, indicative matters laid out in the criteria related to that heading. We will add an extra paragraph to the introduction to make this clear.

- Paragraph 17 provides broad areas under which the Committee may request further information from an applicant. For example, if an applicant has provided limited case studies and consequently, considering the whole application, a decision about that application cannot be reached, the applicant might be asked to provide further information in certain areas or to provide clarification. The nature of the further information will vary according to the information included in the original application. If that information is not forthcoming, it is unlikely that the Committee will be able to reach a positive decision about that application.

Effective practice (paragraphs 10 and 11)

These paragraphs outline the factors the Committee will take into account in determining effective practice, including a statement of practice and up to three case studies.

- An individual respondent and the BPS said that they thought that the definition of effective practice was not really clear and that the means outlined to test this were 'minimal'.
- An individual respondent suggested that more guidance was necessary (e.g. 'client group, setting, interventions, therapeutic orientation, supervision arrangements for current clinical practice and full details of training and supervised practice undertaken in clinical psychology').
- An individual respondent and the BPS quoted the HPC's review of the grandparenting process 2003-2005 which highlighted that sometimes applicants provided insufficient information with their applications which they subsequently provided on appeal.
- The BPS Division of Occupational Psychology suggested in paragraph 11 that a further sub-paragraph should be added: 'verification by professional supervisor or professional line manager who knows the individual's work and can attest to their range of competence as a professional practitioner'.
- The BPS raised the ethical matter of consent to the submission of case studies.

Our comments

- The guidance notes will provide more information for applicants about providing case studies and will encourage applicants to provide as much as information as possible in order to allow an informed decision to be reached.
- In our publication, 'Review of the grandparenting process – 9 July 2003 to 8 July 2005' we reflected on the first grandparenting process we run. In particular, we noted that, early on, we identified that sometimes applicants did not provide enough information. In response, we amended our guidance notes to explain the process more clearly and amended our processes so that assessors would more routinely ask applicants for more

information if they were unclear about areas of the application. The learning from this process, and a subsequent grandparenting process, will inform our approach and the guidance we publish for practitioner psychologists.

Tests of competence (paragraphs 12 to 15)

These paragraphs outlined that an applicant may be required to pass a test of competence. Paragraph 13 sub-paragraphs A to I outline the ‘headers’ that such a test of competence might cover. Paragraph 15 outlines that tests of competence will be conducted by assessors appointed by the Council who will normally be persons who are registered practitioners of the relevant profession.

- Two individual respondents and the BPS said that it would be helpful to indicate the circumstances in which an applicant might be required to undertake a test of competence.
- An individual and the BPS said that the headers in paragraph 13 were appropriate but said that it would also be appropriate to add ‘clinical research competencies (including designing and conduct clinical research and also interpreting research evidence to ensure provision of effective interventions), which are recognised as integral to the role of clinical psychologists and indeed all applied psychologists.’
- The BPS Division of Occupational Psychology suggested that the headers for tests of competence at paragraph 13 should be changed to cover ‘...the key concepts of the bodies of knowledge relevant to the specific domain of professional practice as determined by the standards of proficiency and approved training routes including a defined period of post qualification supervision’.
- The BPS Division of Occupational Psychology suggested an amendment to paragraph 13H to read: ‘...communication with service users including customers, sponsors, commissioners, other professionals and other service providers, which may include assessment of the need for referrals or second opinions.’
- The BPS said that it was necessary and important that any assessment was undertaken by individuals from the requisite domain who held the relevant protected title. They asked that the criteria were amended to specifically state this. They asked for confirmation from the HPC that all evaluations of competence would be conducted by qualified individuals who held or previously held Chartered Status and membership of a relevant BPS Division.

Our comments

- An applicant may be asked to undertake a test of competence where, following any further information the applicant may be asked to submit, assessors are unable to reach a clear decision about an application on paper alone. Whether a test of competence is required will depend on the individual application. When we have run grandparenting processes in the

past, tests of competence have most commonly taken place in relation to Route B applicants because of the requirement to demonstrate that the full range of standards of proficiency have been met. If an applicant declines the opportunity of a test of competence and no other information is provided in order to satisfy the shortfalls originally identified in their application, then their application would be declined.

- Tests of competence are normally oral interviews with two registration assessors (registrants in the domain for which the applicant is applying). However, as a test of competence is tailored towards reaching a decision in relation to an individual applicant, there may be circumstances in which other forms of test might be devised. The criterion says ‘normally’ to guard against unlawful fettering of discretion and to reflect that, in the event of a written test in particular, there may be a distinction between ‘conducting’ the test as opposed to the ‘assessment’ of the test.
- We note the suggestion for a header specifically about research competencies. We believe this suggestion is substantially covered by paragraphs A and B. In determining the outcome of a Route A application, the assessors can have regard to the standards of proficiency; in determining the outcome of a Route B application the assessors must be satisfied that the applicant meets full range of standards of proficiency required for entry to the Register. These standards include research competencies so are taken into account in the assessment of the application.
- We note the suggested wording for a new header under paragraph 13. We consider that some of this wording would duplicate paragraph 13A. In addition, the test for Route A applications is that the applicant practises lawfully, safely and effectively and whilst we are able to have regard to the standards of proficiency in reaching a decision (paragraph 11B refers), we are not able to require that the applicant meets all those standards.
- We note the suggested wording for paragraph 13H in order to add sponsors, commissioners and others to the list given. We believe these groups are already covered by the term ‘service users’. However, we will add a definition of service users to the criteria in order to make this clear.
- All applications are assessed by two registration assessors, who are registrants in the domain for which the applicant is applying. For example, the application of someone applying to be registered as a sport and exercise psychologist would be assessed by two HPC registered sport and exercise psychologists.

References (paragraph 16)

This paragraph says that applicants may provide whatever evidence they consider appropriate to support their application, and that applicants are not obliged to provide references. The draft criterion proposed that the lack of a reference should not be a ground for rejecting an application, but, where one is provided, this should be taken into account in determining the outcome of the application.

- The AHPD, ASPEP, BPS, the BPS Division of Occupational Psychology and several individual respondents said that a reference or references from relevant professional psychologists would strengthen an application and should be compulsory for all applications.
- The rationale for arguing that such references should be compulsory included the need for some kind of independent verification; that it would provide a simple safeguard against false information being given; that requiring such a reference from all applicants would not be an obstacle as, even if self-employed, all psychologists were required to engage in supervision; and that such a requirement would not be unreasonable and would be consistent with arrangements for other professional registers.

Our comments

- We agree that a reference or references can be helpful as part of the evidence to consider in determining an application.
- The onus on providing evidence to satisfy the Committee that the requisite 'test' has been met lies with the applicant who is able to provide what information they consider necessary in demonstrating that they meet the requirements for registration. The HPC has no express power to make such references compulsory. However, if a reference is provided, it can be considered as part of the all the available evidence in determining whether the requisite test has been met. If further information is required, this can be requested under the provisions of paragraph 17.
- The HPC takes allegations of false information provided with applications for registration very seriously. Applicants are asked to sign a declaration to the effect that they understand that the fraudulent procurement of an entry to the HPC Register is a criminal offence under Article 39 of the Health Professions Order 2001. Each application is checked administratively and clarification sought if information or supporting documents appear to be inaccurate, contradictory or forged. If it comes to our subsequent attention that an entry in the Register has been fraudulently procured, this is dealt with by the Investigating Committee under our fitness to practise process and could lead to the removal of the individual from the Register.

List of respondents

Below is a list of those who provided responses to the consultation. Where a response has been made on behalf of an organisation we have given the name of the organisation in the text. Where the response comes from an individual we have not.

We received 11 responses to the consultation; 5 responses from organisations and 6 from individuals.

We would like to thank all those who responded for their comments.

Association of Heads of Psychology Departments (AHPD)
Association of Scottish Principal Educational Psychologists
British Psychological Society (BPS)
British Psychological Society – Division of Occupational Psychology
University of Stirling and University of Dundee

We received one response after the consultation deadline; unfortunately we were unable to take this into account in the analysis of responses.

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