

**CThA Response to October 2007 Progress Report
of
Federal Working Group**

The Complementary Therapists Association, a Professional Association, represents some 10,000 multi-disciplined complementary therapists. To be accepted for membership each must have qualifications that meet NOS or equivalents.

CThA has throughout the process of Regulation discussions taken the position that there should be

1. A single register and regulatory system covering all therapies on a voluntary self regulation basis
2. The National Regulator should regulate the practice of registrants as therapists
3. Each therapy should through its national body set and maintain, and so regulate, the professional standards for the practice of the therapy
4. The fees for registration should be minimal and thus affordable

The Progress Report dated October 2007 is referenced for comments below.

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1 Introduction

CThA is concerned that in para 4 that the FWG is proposing an organisation that will be “setting realistic standards for the professions”

CThA believes that these professional standards should be set by properly constituted bodies representing each therapy and that the role of the Regulatory body would be to co-ordinate and apply these standards to the registration and regulation of practitioners. Clearly these bodies (named as “Professional Forums”) need to work closely with the scheme.

CThA would like to see more clarity on the role of CNHPC in the management of these roles.

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Organisation diagram

The diagram does not indicate what administrative and management structure is envisaged and how this relates to the “Boards” which all appear to be advisory rather than executive.

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Structure

CThA understands the need to relate to the White Paper however it does not accept that it is wise for the Council, which appears to have ultimate power, to be entirely “lay”. Other regulatory bodies have a proportion (say 50% of members professionally qualified on their Council so that decisions are taken with knowledge of the profession.

The term “professional bodies” is used. It is not clear if this refers to Professional Forums (those organisations that form the core of the therapies) or Professional Associations (whose role is to represent individual practitioners).

Clarity on this is needed.

4. Relationships between the CNHPC and Professional bodies

It is not clear what is meant by “professional bodies”.

CThA appreciates the wish of the Council to have links with the profession.

PSBs.

It is not clear what the role is. Is it advisory or decision making?

Does it act for itself or does it represent the therapy (not the therapists) it relates to?

Will PSBs make decisions on such as:

1. acceptance or otherwise of an individual registrant?
2. acceptance or otherwise of a qualification?
3. complaints against the professional practice of a therapy by a registrant on whom a complaint has been lodged?
4. Does the Council expect that the PSB will consult with and take direction from its Professional Forum on all matters of the standards of practice of the therapy and to the educational and training standards for that therapy? Notre, currently national qualifications approved by Dept. for Education in therapies are approved between the therapy bodies, Skills for Health and QCA.. There is a danger of confusion if either the Council decides on these matters or if only the PSB members do.

Later in the paper it is said that PSB members (3 of them) will be “nominated” by the Professional Forum. CThA considers that those 3 members should be appointed by the Professional Forum and be capable of being replaced by that body.

CThA considers that by this means it will be shown that the “Self Regulation of the Therapies” is maintained by those responsible for the development of such therapies..

PAP

CThA thinks that the Council should as stated “take account” of PAP and that where there is disagreement the same arbitration process be applied as for PSBs..

Also more clarity is needed on what areas are relevant for the PAP.

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5. Roles and responsibilities of the FRC, PSBs, FRC Boards and PAP

FRC

It is not clear if this is an executive body with staff (eg to be the “initial point of contact”) or a strategic decision making body.

Certainly an “all lay” executive body could not carry out the functions listed.

FRC Boards

It is not clear if these are advisory or executive.

PSBs

see above

PAP

It needs more than dialogue. It is the only place where the Council will be able to deal with issues that cross many or all therapies and be able to realte the standards of therapes new to the scheme with those existing.

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6. The work of CNHPC

Accreditation of courses

CThA believes that the draft may confuse two aspects. Accreditation of courses is not the same as accreditation of qualifications. The complementary therapy profession is full of schools and individuals who teach therapists and provide them with “Certificates of Attendance or Completion”.

The course may list all the right content but it is the performance of the student which has to be checked.

The Dept for Education has several models of accreditation of qualifications (see QCA). Each registrant should hold a Diploma that can be shown to indicate that following a suitably robust and verified assessment.

The Council suggest licencing “professional bodies”. It is not clear which these are: are they Professional Associations (such as CThA) or are they Professional Forums such as General Council for Massage Therapy.

CThA suggest that the Council should licence on the latter to carry out this work and ensure through the Education and Training Board that each such PF has in place appropriate assessment and verification procedures that meet national standards for this activity.

Grand parenting, APEL, and CPD

CThA believes that for the PSB to be able to ensure this it will need to be structured as set out above.

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9. Business plan and registration fees

CThA has conducted surveys over the years and again very recently that indicate that the overwhelming number of therapists cannot and will not afford fees of the level suggested. £25.00 for initial registration and £5.00 per additional therapy has been shown to be affordable for the majority on a voluntary scheme..

CThA would be interested to learn of the survey work done by FWG to indicate likely take up by individuals.

Also CThA would be interested to learn of the promotional and publicity plans and their costs.

10. The Department of Health's views

CThA has consistently asked of FIH and the Department at public and private meetings if the Department of Health will be advising all those in "medicine" and related professions to use and refer only to registrants on the proposed scheme.

Without this benefit CThA believes that many will not see the advantage of joining a voluntary scheme. CThA members have over many years had no difficulty indicating their trustworthiness and professionalism to the public evidenced by the tiny number of complaints it has received.

Direct answers to Appendix 2

- We have tried to develop an organisation which is 'light touch' and cost effective. Do you think we have succeeded?

There is nothing really in the proposals to indicate "light" or "strong" touch. That will depend on how strictly the various boards interpret issues.

It is also hard without having seen the business plan, staffing, set up costs etc to see if it is cost effective.

- We have tried to find a good balance between lay involvement and professional involvement in the new organisation. Do you think we have got it roughly correct?

It seems that structurally this can work as set out provided the roles are more clearly defined

- Do you think the proposed organisation will command public confidence?

That will depend on how well the scheme is promoted to and explained to the public through national advertising, TV, articles on newspapers and magazines. Without that the "public" will probably not generally even know the scheme exists (eg HPC)

More important for practitioners is if the medical profession will respect the registrants because the medical establishment has mostly not wished to work with CAM practitioners in any integrated way.

- Are the roles and responsibilities of each part of the organisation clear?

No, as set out above.

- Do you like the proposed name of the organisation – The Complementary and Natural Health Professions Council? If not, what alternative do you suggest?

"Natural Health" is not different from all health .

Why not just the Complementary Therapies Professionals Council"

- Does the fee level of £45 (for first discipline) and additional sums for second and subsequent disciplines seem fair?

Much too high as shown above.

- Do you have any views on the proposed complaints process?

No. It will evolve with experience. It is unlikely to be busy!

- Do you have any other comments on Section 6, about how the CNHPC will work?

All set out above in detail

- Do you think we have forgotten anything important: If so, what?

You need to look at the real benefits the scheme will bring to registrants. “Public confidence “ is not likely to be sufficient.

- Do you have any other comments about the proposed model?
No