contract terms entered into by the practitioner to the effect that: 'I undertake to be available to you for 'y' years at 'x' frequency and will be so available come rain or shine, whatever happens (as long as it is within the law) and whatever variations in your ability to pay may arise . . .'

Commitment to clients is not a question of time and money spent on what may well be irrelevancies. It is a function of the integrity of the practitioner. This is a quality neither demonstrated by submissive compliance with arbitrary requirements ('to get my licence') nor by a hubristic offering of oneself as a practitioner without an appropriate background of experience, training and preparation for the task.

The proposals that I make in *The Case Against Psychotherapy Registration* for differentiating types of work are on the basis of the status of the intended recipients and the goals and models underlying the activities. This offers, I think, a sounder basis for differentiation than the distinctions which I have been discussing above. Moreover, the SAFAA criterion does in fact encompass issues of responsibility and commitment. Where the criterion is met, issues of frequency of contact, breaks, du-

ration and so on become a matter for agreement between the two parties what the client wishes for, in relation to what the practitioner is willing to provide. Furthermore, as regards differentiating human potential work, my proposal was for both the criterion of SAFAA and that of an underlying model of growth, rather than a medical one, whether obvious or in disguise. In the case of medical model activities and growth model activities with people for whom SAFAA does not hold, practitioners perforce take increased responsibility for the client/patient, who by the same token has reduced self-direction and autonomy.

As I indicate in the book, the SAFAA criterion is a question of the presence or absence of SAFAA, rather than the presence or absence of distress as such. I also suggest that if there were to be any form of state intervention to address provision for those who do not fulfil the SAFAA criterion, then what I referred to as a 'noncredentialed' system would hold greater prospect of consumer protection than the statutory registration typically promoted by training and practitioner organisations.

## A Note on Registration

## John Rowan

In the August 1995 issue of *The Psychologist* is an article from the British Psychological Society's working party on statutory registration, outlining in some detail their current thinking. Here are

some short extracts from the article.

1. 'The Bill will make it unlawful for any person whose name is not entered on the Register to use the title psychologist or

any other title or description incorporating the term psychology, psychological or psychologist, or any variant of them so as to indicate or reasonably be calculated to suggest that he or she is a psychologist in the course of offering or agreeing to provide services as a psychologist, or seeking or holding employment as a psychologist or of claiming competence in the practice of psychology. The Bill will also make it unlawful for any organisation, corporate body or partnership to use a title, designation or description using the term psychology, psychological or psychologist, or any variant of them so as to indicate or reasonably be calculated to suggest that it is willing and able to provide psychological services, unless in the course of offering or agreeing to provide such services, the organisation concerned employs or retains a psychologist or psychologists whose names are entered on the Register and the psychological services offered or agreed are provided by or under the direct supervision of these Registered Psychologists.'

The article goes on to make it clear that the word 'psychotherapist' is not covered under this rule.

2. 'Transitional arrangements will be required. For two years after the Bill has become an Act, persons who have been engaged in the practice of psychology in the United Kingdom for at least three of the five years prior to the date of the leg-

islation coming into force, shall be eligible for inclusion on the Register, notwith-standing the fact that they may not have all the qualifications and requirements necessary for registration as a Chartered Psychologist. (In these cases the Council will be required to satisfy itself that the people concerned are competent to practice psychology without supervision.)'

There is some discussion of disciplinary matters, and of the fact that the disciplinary committee meets in secret.

3. 'The fact that non-psychologists are in the majority on the Disciplinary Committee provides the guarantee to the public that the profession has not closed ranks to protect one of its own. The Bill will introduce a new appeals mechanism. Any psychologist who is found guilty of professional misconduct can have the transcript of the hearing considered by a freshly appointed Committee on which non-psychologists are still in the majority, before exercising his or her right of appeal to the Judicial Committee of the Privy Council. This new appeal will look specifically at the conduct of the proceedings.'

The working party is now entering a stage of extensive consultation, and any organisation whose interests might be affected should write to it care of the British Psychological Society, 48 Princess Road East, Leicester LE1 7DR. Individuals may also make comments.

