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Psychological Society  
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## Ethical trading

Guidelines for practice for educational psychologists  
2nd edition



Division of Educational and Child Psychology  
December 2018

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# Foreword

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The first edition of these guidelines was produced in response to the rapidly changing pattern of service delivery for educational psychology services (EPSs). Until this time the vast majority of educational psychologists (EPs) were employed by local authorities (LAs) to deliver psychological services to all children and young people within a geographical area as part of the LAs' centrally retained services. In most cases the main commissioners were the local authority (LA) and LA schools.

The growth in academies and the shifting emphasis in role of the LA from service provider to commissioner and provider of services, together with public sector cuts throughout the UK, has seen the emergence of more mixed models of service delivery. Over the last five years the models for the delivery of EP services have become increasingly complex and direct commissioning from schools, parents, carers and others more common. This trading raised, and continues to raise, a number of ethical questions for EPs.

The first Ethical Trading Working Group was convened by the Division of Educational and Child Psychology (DECP) committee in response to concerns within the EP profession and a need for clarification and guidance for professional practice.

A working group was convened comprising EPs representing a range of different bodies and with experience of diverse trading models. This group included PEPs, main grade EPs, trainee EPs (TEPs), private EPs and representatives from the training courses and the Association of Educational Psychologists (AEP). The first meeting was held in March 2012 where the framework for this guidance was developed and key ethical dilemmas identified. Significant concerns were raised about some situations in which trainees could be working in traded contexts, and so there were two surveys of TEPs and Programme Directors that informed this guidance. A wider reference group was also established to read and comment on drafts. This included participants at a one-day workshop run by the BPS Professional Development Centre who gave feedback on the draft version.

A second working group was convened in response to concern that as commissioning relationships become more complex so too do potential ethical dilemmas. The second group was smaller and included DECP committee representatives, PEPs, main grade and private EPs. There was a small, informal survey of DECP members and a re-run of the TEP survey. The group decided to revise the existing document *Ethical Trading: Guidelines for Practice for Educational Psychologists* and also, to sit alongside this, produce guidelines for commissioners. As with the first edition a wider reference group, including headteachers and parents, read and commented on drafts of the documents.

We are very grateful to all of those who gave so generously of their time, knowledge, skills and experience in the development of both the first and second edition of the guidance and the document for commissioners.

**Harriet Martin and Julia Hardy**

# 1. Introduction

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This guidance is a second edition of *Ethical Trading Guidelines for Practice for Educational Psychologists*. Over the last five years an increasing number of educational psychologists (EPs) are working in different contexts and are not directly employed by local authorities (LAs). There are also an increasing number of commissioners of EP services, such as NHS trusts, clinical commissioning groups (CCGs), children's social services, other professionals and individual parents and carers. The format of and assumptions underlying the first edition are relevant to the current context, however, as EPs' commissioning relationships have become more complex the ethical dilemmas that may arise have also become more complex.

This guidance offers a framework to support the thinking and decision making around ethical practice. It does not offer answers to ethical dilemmas but proposes some ways of approaching them. It is purely concerned with the ethics of delivering purchased services by EPs to a range of commissioners, such as academies, individuals and training courses. Our focus is on safeguarding the interests of the client and promoting ethical behaviour, attitudes and judgements on the part of EPs in order to uphold the highest standards of professionalism.

This guidance is not concerned with the ethics or law relating to employment practice, although we could expect PEPs and other managers to have regard to wider ethical issues relating to the wellbeing and career development of employees. The AEP (2011) deals with employment issues, such as terms and conditions, within a traded context.

In this guidance the term 'client' refers to any person or persons with whom a psychologist interacts on a professional basis in order to deliver a service. EPs have multiple clients; for example, a client may be an individual (such as a pupil, a parent, a teacher, a TEP, or a research participant); a pupil, family or staff group; an educational institution; or a private or public organisation, including a LA. A psychologist may have several clients simultaneously within the same piece of commissioned work, including those receiving, commissioning and evaluating the professional activity. The power dynamics within these relationships are likely to be significant factors when considering ethical issues.

An ethical dilemma may be faced by an individual EP or by an EPS when they believe that they are being required to perform an action in violation of any of their professional codes, or when they believe that providing an ethical service to one client is dissonant with providing an ethical service to another, where it is not possible to satisfy the needs of all clients and service users involved. As relationships between EPs and commissioners become more complex there may also be others, not clearly identified as clients, who need to be considered. In such cases a balanced decision which is ethically (and legally) justifiable has to be transparently reached.

The guidance focuses on the ethical considerations relevant in contracting, delivering and monitoring EP services and also gives guidance to support the design of trading models. This document will be of interest to all practising EPs, employers, commissioners and managers within local authorities and other settings. The document is therefore relevant to all EPs, irrespective of their working contexts. It may be of particular interest to those who are developing EP services and to programme directors and their TEPs who are in a potentially more vulnerable position with regard to trading.

It is important that this document is read with due regard to other documents, such as the following:

- BPS *Code of Ethics and Conduct* (2018);
- BPS *Practice Guidelines* (3rd edition) (2017);
- DECP *Professional Practice Guidelines* (2004);
- BPS *Code of Human Research Ethics* (2011);
- DECP *Professional Supervision: Guidelines for Practice for Educational Psychologists* (2010)
- BPS *Safeguarding and Promoting the Welfare of Children, Position Paper* (2014, 2nd edition)
- HM Government's *Working Together to Safeguard Children: A guide to Inter-agency Working to Safeguard and Promote the Welfare of Children* (2015);
- BPS *Data Protection Act 1998 – Guidelines for Psychologists* (2009).

These documents may also prove useful:

- The Equality Act 2010;
- Health and Care Professions Council (HCPC) *Standards of conduct, performance and ethics* (2016);
- HCPC document *Confidentiality – Guidance for registrants* (2017).

This document covers what were considered to be the four key areas of potential concern regarding ethical practice within a traded environment:

1. delivery of EP services: ensuring fair and competent practice;
2. trading services: implications for TEPs, assistant EPs and assistant psychologists;
3. ethical communication;
4. marketing and ethics.

The theme running through this document is that having a key framework for considering ethical dilemmas is as useful for services functioning within a traded environment as it is for those in an un-traded context. After all, EPs have always worked in complex and often messy situations. The guidelines are written with reference to the principles of the BPS *Code of Ethics and Conduct* (2018). The Code, however, mainly addresses the work of individuals whilst the trading context highlights the need for ethical mindfulness at the whole service level (where the term 'service' denotes any model of EP delivery) as well the individual level. As the overall proportion of EP services that are directly commissioned and paid for, rather than being free at the point of delivery from the perspective of some clients, increases, the possibility of tricky situations arising also increases. Good, clear communication between EPs, and between EPs and their actual, and potential commissioners, is becoming more important than ever.

Framework for considering ethical dilemmas	
1	<p>Identify the relevant issues:</p> <ul style="list-style-type: none"> <li>● What are the parameters of the situation?</li> <li>● Is there research evidence that might be relevant?</li> <li>● What legal guidance exists?</li> <li>● What do peers advise?</li> <li>● Is there guidance available from the HCPC or other relevant bodies?</li> </ul>
2	Identify the clients and other stakeholders and consider or obtain their views.
3	Use the <i>Code of Ethics and Conduct</i> to identify the principles involved.
4	Evaluate the rights, responsibilities and welfare of ALL clients and stakeholders.
5	Generate the alternative decisions preferably with others to act as a sounding board.
6	Establish a cost/risk benefit analysis to include both short- and long-term consequences.
7	Make the decision after checking that the reasoning behind it is logical, lucid and consistent. Document the process of decision making.
8	Assume responsibility and monitor any outcomes.
9	Apologise for any negative outcomes that result. Many formal complaints are often a client's only way of obtaining an acknowledgement of distress. Saying 'sorry' does not automatically admit liability.
10	Make every effort to correct any negative outcomes and remain engaged in the process.
11	Learn from the process for yourself, for others and for the Society.

Figure 1: Framework for considering ethical dilemmas

## 2. Delivery of EP services

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### Introduction

This chapter will consider ethical issues when delivering services in a traded context.

A range of traded models for the delivery of EP services have emerged. Many of the ethical dilemmas faced in this context are common to all types of service delivery, others relate to specific models. Certain situations can also pose different dilemmas depending on whether you are an LA-employed EP, a service manager or a private EP. However, many of these problems are not unique to the traded landscape and psychologists should continue to accept their responsibility to attempt to resolve such dilemmas with the appropriate combination of reflection, supervision and consultation.

It is clear though that a traded environment throws up different challenges to our established EP ethical practice. At such a time it is important to revisit fundamental ethical principles in order to guide decision making. The principles are to be found in the BPS *Code of Ethics and Conduct* (2018). The intention is not to provide answers to dilemmas but to offer EPs an aid to reflection.

There are three areas in particular deriving from the principles that a traded environment throws into sharp relief:

- i. ensuring that we are not practising in a way that may be seen to be unfair;
- ii. ensuring that we practice with competence and develop professionally;
- iii. integrate ethical reflection into our practice.

EPSs need to see these as priorities. As an increasing proportion of EP work is directly commissioned, the concept of fair practice becomes more complex. For example EPs are less able to control access to their services and will, therefore, need to reflect more carefully on their broader responsibilities to vulnerable children and families and the ‘unsponsored child’, if any, alongside the children and families with whom they are directly commissioned to work. From a commissioners’ perspective, particularly as the range of EP services available grows, they will need to be clear on what a particular service offers and how that service ensures it maintains a high quality of practice.

### Ensuring fair practice

When questioned about trading, one of the most common concerns amongst EPs is that paying for services will inevitably lead to vulnerable children losing access to services. The assumption is that EPs will not be able to challenge schools or other commissioners if they believe that the prioritisation of work is misguided. In the worst case scenario EPs may fear that commissioners will assert their rights as purchasers to demand services the EPs believe are neither appropriate nor fairly apportioned. There are two strands of this to consider:

- whether this fear is justifiable and, worse, that by thinking it true, EPs may paralyse themselves and be unable to behave even as they did before the advent of trading;
- whether commissioners see themselves as purchasing a product they choose or a service within which challenge, negotiation and cooperation in the best interests of children and young people is an integral part.

Upon reflection, many EPs, when they stop and think, report that those headteachers and special educational needs coordinators (SENCOs) who were always inclined to assert their own agenda and make demands still do so when a service is traded, and those who worked in partnership with EPs to determine the most efficient and effective use of EP time in support of the most needy children continue to do this when a service is traded. The ways and means of moving the former type of school to the latter remain the same. The fact that a school, or other commissioner is purchasing services does not change the argument that an EP service, a scarce and relatively expensive resource, should be used in the most efficient, effective and fair way possible.

To inform the second edition the DECP undertook a small, opportunistic survey of members. The survey asked EPs to comment on several areas, in particular whether they had experienced any: issues working with EPs not in the same organisation; conflicts of interest, for example as a result of who is commissioning the service; marketing issues including publishing information and pricing; issues finding out about quality assurance; practice that may be considered discriminatory. This survey highlighted a range of EPs' concerns. Of particular relevance to this guidance were the following:

- the ethical challenge of schools not purchasing time or prioritising children for inappropriate reasons (this was also mentioned as discriminatory);
- LA work outsourced to private EPs without sufficient line management and scrutiny of potential conflicts of interest;
- parents being unaware of the status of an EP e.g. thinking a private EP works for the LA;
- refusal of private EPs to share information, e.g. not knowing which tests may have been completed;
- both LA services and private EPs not always having a coherent, transparent mechanism for quality assurance.

Members of the DECP working on this new edition were particularly concerned about conflicts of interest and challenging discrimination. Difficulties in these areas can result in unfair practice. They are also areas that are implicit, or referred to, in the BPS *Code of Ethics and Conduct* (2018) and the HCPC's *Standards of Conduct, Performance and Ethics* (2016).

## Conflicts of interest and challenging discrimination

EPs may wish to consider not just their own potential conflicts of interest but also those of commissioners/clients. It is important that commissioners and EPs are aware of all potential conflicts of interest in service delivery and discuss this before any work is undertaken.

A commissioner should clarify the details of the areas of work that an EP may do (such as when commencing work as the EP for their school) and ask for details of what service they deliver in this area, for example the assessment of students with specific learning difficulties or interventions that they may offer for those experiencing mental health difficulties. The commissioner needs to make explicit the breadth of the work that they are funding and any limits to this. EPs should ensure that this is discussed. An example may be if a parental consultation has been commissioned and the child/young person then moves out of the geographic area; it will be in the best interests of the child to agree that the EP has to follow up any incomplete work and liaise with the new setting/another EP and/or other professionals as required.

EPs are encouraged to reflect on their practice, which will include conflicts of interest and how they might challenge discrimination, both through CPD and supervision. If the commissioner is concerned that there is evidence of a lack of reflective practice they should raise this, first with the EP that they have commissioned, and if concerns continue, with the line manager of that EP if there is one.

EPs have a duty to promote and protect the interests of service users and carers (HCPC, 2016, *Standards of Conduct, Performance and Ethics*, p.5) and have a duty of care towards their clients. On occasion this duty may be in conflict with the expectations and requirements of the commissioner. The best interest of the child or young person is paramount. EPs will respect the process of those commissioning the service but remain mindful of their professional responsibilities. It is the EP's duty to make the commissioners aware of the HCPC standards and only undertake commissioned work where they work within the standards. Any work undertaken by an EP will also be with the informed consent of those they work with (BPS, 2017, *Practice Guidelines*, p.48).

EPs must treat service users with respect and dignity. EPs seek to establish good relationships and trust with their clients, other professionals, commissioners and the wider community. They should maintain awareness and vigilance of the complexity of professional relationships and the need to observe their boundaries. Psychologists should clarify for commissioners, clients or service users and other relevant stakeholders when any issues might arise.

It is expected that all EPs will have the necessary skills and abilities to work with all sections of the community in which they are commissioned to practice. It is the EPs duty to identify professional development needs and to address these e.g. cultural awareness and competence through supervision and continuing professional development (CPD).

EPs must work to promote social inclusion, where the needs of all members of the communities and the groups which constitute them are recognised, prioritised and met, resulting in these individuals feeling valued and respected. This also requires EPs to work on wider structural and systemic issues which maintain excluding processes and power differentials. (See BPS *Practice Guidelines*, 2017, sections 3.11 to 3.14 for more detailed guidance on how EPs can improve social inclusion for diverse client groups listed above.) Direct commissioning of EP work, with the accompanying increase in number of and complexity of relationships with clients will inevitably result in more complex dilemmas, particularly where there is the potential for discrimination or social exclusion.

The Equality Act (2010) protects people against unfair treatment, promotes equality and prevents discrimination. The HCPC *Standards of Conduct, Performance and Ethics* (2016) state that 'You must not discriminate against service users, carers or colleagues by allowing your personal views to affect your professional relationships or the care, treatment or other services that you provide,' (p.5). Respect is a core ethical value for EPs and commitment to equality of opportunity is embedded in all aspects of psychological practice. EPs, where they operate in an organisational context, must also seek to encourage and influence others in ensuring that equality of opportunity is embedded in all thinking and all practice relating to access to services for client groups and recruitment and employment practices. This can potentially be challenging in the context of working for multiple commissioners.

## Terminating a contract or service level agreement

At any point in the commissioned arrangements or requirements within a service level agreement, if an EP perceives or anticipates expectations are likely to lead to discriminatory practice, then the EP should:

- inform their commissioner of their concerns and, if necessary, re-negotiate the contract so that this does not lead to discriminatory practice;
- seek advice from their employer, head of service or clinical lead, where applicable;
- seek advice from HCPC and or the BPS, if appropriate.

It is recognised that this guidance does not offer answers to ethical dilemmas nor some kind of formula for identifying discriminatory practice. However aspects of the framework offered for considering ethical dilemmas are likely to be helpful in considering whether practice is unacceptably discriminatory or whether a conflict of interest interferes to an unacceptable degree in terms of outcomes for children. EPs should acknowledge that, following careful reflection, there may be cases where the only option is to terminate the contract or service level agreement.

## Some specific dilemmas

Throughout this guidance it is recognised that there will be very few, if any, right and wrong answers to ethical dilemmas. Rather, an EP or an EP service must reflect on a situation and make a judgement on the basis of their reflections. The model presented on page 4 is offered as a helpful framework to structure thinking when faced with ethical dilemmas. A number of themes are considered in the dilemmas below, including:

- Fairness/equality of access
- Duty of care/responsibilities to all vulnerable children and the unsponsored child
- Conflicts of interest, both for the individual EP and/or for the commissioner
- Potential discriminatory practice

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## Dilemma 1: Should a service sell to individual parents?

Some questions to consider:

### **On fairness/equality of access:**

- Would this be at the expense of other children or could the service be expanded to enable them to carry out the extra work? If a paying parent was able to ‘jump the queue’ or take the place of a non-paying child then this could certainly be deemed unfair and restrictive of access. However, if a service employed more staff to cope with paying parents, then this might not necessarily be seen as unfair.
- Is there a principle that no individual should be denied a service on the grounds that they cannot afford it? Is this clearly stated within the service level agreement? Accepting payment from some parents may lead to the possibility that other children could receive the service.
- If the service is essentially paid for by ‘public money’ is it unfair to divert capacity to private practice even if paid for? This is related to the question of whether a publicly funded service should not take on privately funded work (see below).

### **On duty of care/responsibilities to all vulnerable children:**

- Parents can choose to buy a service from a private EP. Does the fact that this is an LA service make a difference? An LA has a responsibility for all vulnerable children in its area; it could be argued that a private EP does not have a responsibility to all children, only those for whom they are contracted to provide a service. LA EPs may need to take into account their responsibilities as LA officers.
- Some schools may pass on any charges for EPs to parents. An EPS would not necessarily know if a school had asked a parent to pay as the school had commissioned the service. If this parental payment had been requested, would this change the service’s view? A service may need to ask if by ‘contracting to the school’ they are then absolved from the ethical responsibility for all children within the school as this passes to the school or whether they should investigate a claim that a school is passing on charging to parents as this may be deemed unfair.

### **On conflicts of interest:**

- If the service is struggling for funds would additional funds be useful?
- Could they be used to contribute to ‘pro bono’ work?

Before an EPS decides whether it will accept payment from individual parents it will need to reflect on such questions. It should be able to justify its conclusions.

While the idea of providing ‘pro bono’ work for the most vulnerable seems attractive, this is a complex issue. Differential charging may be regarded as unfair. Deciding who should benefit is not straightforward. Some may consider that to not charge for work for which other psychologists would charge undermines the work of the charging psychologist. Before an individual EP decides whether or not to do some work for nothing they should consider the wider context within which they work including how their decision may affect people’s attitudes to psychologists in general.

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**Dilemma 2:** An EPS (or sole trader) decides to offer a 'speedy' service. If a client pays more, they are guaranteed a service within a short, specified time.

Some questions to consider:

**On fairness/equality of access and challenging discrimination:**

- Is this 'unfair' to clients who cannot afford the speedy service (particularly if all will be seen eventually)?
- Is this sufficiently respectful of 'socio-economic status'?

While there are dilemmas for services there may also be dilemmas for individual EPs working within those traded services. Most of these tensions will be familiar but can seem more difficult to resolve in a traded environment. For example: Does an EP complete a piece of work that does no harm but may have no real benefit for the child or family in order to further enhance that EP's relationship with the school or to get a toe in the door? Does an EP spend additional time offering informal consultations to school staff or even mentoring the headteacher even though this has not been commissioned? How generous (flexible) should an EP be of their time when this time is being paid for? How does an EP decide if the time paid for by the school is sufficient for them to complete a task or deliver a service that is of an acceptable standard? For private EPs these questions are likely to seem familiar but many LA EPs may not feel that these issues were as relevant in the days of a total 'free at the point of delivery' service as they are now in a traded environment. However, this does not mean that they are new dilemmas; only that EPs may notice them more in a traded context.

Questions for the individual EP and for the EPS when developing a service level agreement or contract:

- How should we balance 'means and ends' – refusing to work on something that does not clearly have immediate benefits but may result in a better service for others later?
- Given that much of the work that EPs do does not always have a linear cause and effect chain, how far removed does the effect have to be for work to be unjustifiable?
- Should EPSs be charging for either of the above? Can they afford not to charge?
- Much of the work that EPs have always done might have been better with more time? How do EPSs and individual EPs within those services decide what is good enough?

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**Dilemma 3:** Insufficient EP time: An EP is asked to take on some work around a very vulnerable child when the school and the EP are aware that the school has not bought sufficient time for this work.

Some questions to consider:

**On duty of care/responsibilities to all vulnerable children and the unsponsored child, and challenging discrimination**

- How has this situation arisen? Is the school deliberately attempting to get more for its money? Is this relevant?
- Can the school afford additional payment? Would this matter?
- Is the EP responsible for this child?

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**Dilemma 4:** An EP is asked to provide work they consider low priority: An EP is asked to provide some training, which the school will purchase. The EP believes that this has been picked because it seems interesting to the commissioner rather than because it is really the most pressing need for the school.

Questions to consider:

**On fairness/equality of access to a range of relevant training:**

- If the training has relevance, and the EP is competent to deliver it, how important is it that it may not, in the opinion of the EP, be directly relevant to the school's current needs?
- Is it the EP's (ethical) responsibility to express a view on the school's CPD programme?

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**Dilemma 5:** Who has responsibility for the unsponsored child?

**On fairness/equality of access and challenging discrimination:**

Generally EPs have tended to assume that as the EPs working in the service are LA employees, and the LA has duties to its entire population of children and young people (particularly those who are vulnerable), then these EPs should consider that their ethical responsibilities are to all children in the area. The issue of what happens to those who are not identified by clients as needing EP support has always been a concern but becomes more so in a traded environment.

Ethical issues vary according to whether the EP is a sole trader, an LA-employed EP or a service manager. For the sole trader, the ethical responsibility is to the individuals they are engaged to work with. If an LA EP has some of his or her services paid for, does this then put them in the same position as the sole trader? Or by working for a LA is their position fundamentally different? Particular difficulties could arise if the EP is engaged to work with a specific school population. As explained above, LA-employed EPs are generally responsible for services to a population within a geographical area including, but not restricted to, those identified by schools and other clients they work with.

Questions to consider:

- Will schools restrict the numbers of pupils they commission support for because of cost?
- Will certain school populations no longer have access to psychological support because of cost?
- Is it the responsibility of the EP or the school if a child does not access an EP assessment or intervention? Should the school or the EP be considered ethically culpable?
- Do all EPs, regardless of the context within which they are working, have some responsibility for the 'unsponsored' child? How might an EP respond to this responsibility? Is pro bono work one option? How might this be achieved?

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**Dilemma 6:** Where there is a difference of view between the EP and commissioner about the level of support provided for a child.

**On possible conflicts of interest and challenging discrimination:**

Where the EP's professional view differs from that of the commissioner, another professional or the carer, EPs are bound to provide a view based on their assessment and research-based evidence rather than one that is necessarily supportive of other's requirements. BPS (2017) *Practice Guidelines*, p.9.

For example if a school has asked for advice on securing an alternative placement for a pupil who is posing significant behavioural concerns, the EP will seek information to come to their own understanding of the difficulties which is likely to include examination of all previous support offered to the pupil and suggestion of appropriate interventions prior to considering the possibility of different placement options. The school may consider that they wish to move the pupil as soon as possible.

Questions to consider:

- Is the EP clear on the support that has already been provided? Are they aware of an evidence base for the interventions suggested?
- What is the pupil's view? And their family?
- Is the EP aware of particular reasons why the school may wish to move the pupil on?

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**Dilemma 7:** Where there is evidence of practice that is not in the best interest of children and young people.

**On challenging discrimination and conflicts of interest:**

For example an EP is present during a staff room conversation in which several pupils are named as trouble makers and further comments suggest this behaviour is 'no more than you'd expect from their family background'. In this case the EP is professionally obliged to take this information to the headteacher.

Another example is where there is a small percentage of BME pupils within a school, however in the 'inclusion unit', the majority of pupils are from this group. The EP should ask for information to examine why this is the case and what might be done to address it.

Questions to consider:

- Is there evidence of unjustified stereotyping? Does the inclusion unit have clear criteria for entry?
- Is there evidence that someone's behaviour or view of a child may cause harm or be detrimental to the child's learning or wellbeing?

## Ensuring that EPs practise with competence, develop professionally and integrate ethical reflection into practice

### **How can supervision and CPD be protected in a traded environment?**

Supervision and targeted CPD are essential elements of ethical professional practice and are integrally linked to the ethical principle of ensuring EPs work within their zone of competency. Some particular dilemmas may occur within a traded environment. These include:

- access to CPD or supervision is restricted because of time costs; and
- pressure to work outside the area of competency.

For an individual EP, many of these dilemmas are similar to those faced in a non-traded environment and the process of ethical decision making described in the introduction should support identification of a way forward. For a service manager or a sole trader, it is essential that time and financial support for these is costed into any contracts and that competence to undertake any activity is carefully monitored through supervision.

In a traded environment there may be opportunity for, or even pressure towards, developing new areas of practice. It is the responsibility of individual EPs to communicate to their managers the areas of professional development that are necessary before they are competent to undertake new work and it is the responsibility of managers to ensure EPs have the appropriate level of training and support for competent practice.

The requirements for professional supervision are no different in a traded environment and these are clearly laid out in the DECP guidelines for professional supervision of EPs (Dunsmuir & Leadbetter, 2010) and HCPC guidelines. Some of these requirements may need to be included in contracts with clients depending on the trading model adopted; for example, where EPs are contracted to individual schools. Provision may need to be specified in contracts for the protection of a safe, private space; adequate time; and access to an EP supervisor with appropriate competencies for the work being undertaken.

An important element of professional development is access to a peer network, where ethical and other professional issues can be discussed and problem-solved with those working in a similar context. Managers should take into account, when designing trading models and service level agreements, that supervision including peer supervision and access to informal EP peer support networks should be integral to the model chosen. Individual EPs working privately may wish to consider setting up a group of EPs to provide this informal peer support and/or organise individual supervision.

EPs are encouraged to reflect on their practice, both through supervision and CPD. They should be aware of competing biases (BPS *Practice Guidelines* 2017), such as their thoughts, professional and personal beliefs, which will have been influenced by their experiences. EPs should also reflect on their motivations, such as wanting to be loyal to colleagues in a school/LA or indeed wanting to establish a reputation in a field of private work that may lead to further work opportunities.

## Recommendations for ethical service delivery

To protect against unethical practice, all EPs need to ensure they work within structures that offer the following:

- Support for reflective practice via supervision, which includes consideration of ethical issues.
- Access to regular peer support for problem solving in complex situations.
- Transparency of professional activity, including ownership and accountability for products developed by services within LA time.
- CPD appropriate to the range of activities undertaken.
- Managers of EPSs who have the competency to understand, pre-empt and resolve ethical practice issues.
- Trading models that have taken into account ethical issues in their design.

### 3. Trading services: Implications relating to the training of EPs

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TEPs are working within EPSs which offer a trading model of services to a wide range of clients. Within this current climate it is crucial that TEPs are fully prepared for the demands that trading brings as they enter the very early stages of their career.

The DECP Ethical Trading Working Group for the first edition of these guidelines explored the implications that traded services have for TEPs by asking programme directors and TEPs to complete a short questionnaire focusing upon the following:

- the main opportunities and concerns relevant to current and future TEPs on placement within settings where there is a trading arrangement (Years 1, 2 and 3); and
- the additional skills and competencies TEPs need to acquire during training to work effectively as EPs in trading settings.

Programme directors were asked an additional question focusing upon the main implications for TEPs of trading arrangements for the Applied Psychology Doctorate course for EPs.

The 2012 survey received 57 responses from TEPs and the six responses from programme directors. These were analysed using thematic analysis and a summary of the findings are outlined below. It should be noted that a minority of TEPs responded to this survey, some of whom may not as yet have experienced placement.

In order to investigate if TEPs' views had changed over the last five years, in 2018 TEPs were asked to complete the same short questionnaire. Despite repeated attempts over several months to engage TEPs the response was poor with only 13 replies. It is not clear why the response was poorer in 2018. However it is possible that trading is now so much part of the landscape that TEPs have less specific anxieties about working in a service that trades. Key findings of the 2018 survey are also reported below.

#### TEP views reported in the 2012 survey

##### Opportunities and concerns

- TEPs reported 30 per cent more concerns than opportunities regarding their time spent on placement in traded services.
- There was strong optimism amongst TEPs that traded services will offer wider opportunities for EPs; in particular, a broader range of work and more opportunities to work in schools. However, this is balanced with a high level of concern that EPs' independence to apply psychology appropriately will be restricted by commissioners' ideas and beliefs, as well as decisions taken on 'what costs less'. This could compromise TEPs' ability to work ethically.
- TEPs reported mixed views regarding whether relations will be improved, both with schools and between colleagues in competing services.
- TEPs expressed some optimism that traded services will offer wider training opportunities for them whilst on placement. However, this was heavily outweighed by concerns about

increased restriction of the scope of work opportunities available and the incompatibility of trainee practice experiences with university requirements.

- TEPs expressed significant concerns about increased pressures on them due to raised expectations regarding the amount of work to be completed in shorter timescales, and meeting commissioners' expectations when they have paid experienced EP rates.
- TEPs expressed mixed views about job security and availability. Particular concerns were raised regarding the reduced numbers of bursaries that may be available, as commissioners are expected to prefer to employ experienced EPs.

### **Additional skills and competencies required**

- 85 per cent of TEPs identified additional skills and competencies which they believe are required to work within traded services.
- The skill that TEPs believed is most required to work effectively as EPs in trading services is marketing, with 42 per cent of responses making reference to this skill.
- The second most important skill that TEPs believed is required by them to work effectively in trading services is negotiation, with 38 per cent of responses making reference to this skill.
- Evaluating outcomes was highlighted by a number of TEPs as a way to demonstrate value for money. As part of the accreditation criteria, TEPs are required at present to apply appropriate psychological evaluation 'to identify practice that maximises impact', (BPS, 2012, p.15) and yet the survey indicates that TEPs believe they require additional skills/competencies in order to do this.
- A key theme to emerge included many TEPs believing further knowledge of business skills is necessary.
- Another key theme which emerged within the data was that TEPs thought they needed to acquire further skills and competencies linked to ethical issues. This includes schools not dictating the work of EPs, and EPs being aware of their own limitations and competencies.

### **TEP views reported in the 2018 survey**

- Only one of the 13 respondents felt that trading presented no opportunities. All the others were positive about the traded environment. They felt that trading enabled more opportunities: for EPs to be creative and innovative leading to a wider variety of work; for EPs to do more preventative work; for EPs to tailor work to schools' needs and to have more control on how the profession is viewed and so raise the EP's profile.
- 11 of the 13 respondents regarded trading as in some way a threat to delivering an equitable service, both because schools may not buy in a service and also in terms of choices schools and others may make for their EP's work; three of them specifically mentioned ethical dilemmas or concerns.
- As in the 2012 survey there is still concern that services will become too 'consumerist' and that there could be tension between the customer (commissioner) and EP.
- Several TEPs mentioned potential threats to EPs' jobs, for example job security if working for an LA and anxiety about generating enough income. There was also concern that EPs could become overly focused on funds and budgets.

## Programme directors' views reported in 2012 survey

The key themes and details of responses from programme directors are included in the appendix.

### Summary of programme directors' views

- Some opportunities were identified within an emerging traded context, including more placement providers; more funding streams; wider variety of commissioned work including therapeutic work; and less reliance on statutory assessment and LA-directed work.
- A number of concerns were raised. These included TEPs having limited learning opportunities; there was a greater risk of inappropriate types of work being commissioned or purchased; headteacher control would have more of an impact; it may be harder to control the quantity of work expected from TEPs; there may be difficulties for placement providers in monitoring placements; and there may be issues about the appropriateness and quality of supervision.
- There were a range of views on the additional skills and competencies that TEPs may need to acquire during training to work effectively as EPs in trading settings. Some suggested skills were commissioning, knowledge of service planning and understanding of school and LA finance. The view that TEPs don't need to acquire additional skills and competencies – services do – was also expressed.
- There were a number of comments that the current training courses covered the skills that were required and that a trading environment does not require changes to the curriculum and to the training arrangements. A number of possible complications were identified related to trading including possible difficulties in getting supervisors to attend university sessions for which they were not paid.
- All but one TEP felt that additional skills were needed in a traded environment. As in the 2012 survey most felt that they needed to be more skilled in sales and marketing. Building relationships and negotiation skills were also listed by over half respondents.

### Summary

Many ethical considerations relating to working within traded contexts are similar to those that have faced TEPs and EPs in the past in non-traded scenarios. At the time of publication of the first edition of these guidelines there were clear signs of a subtle yet evident shift in the negotiation of work provided by EPs, with a greater emphasis on income generation and trading. This is reflected in the responses provided by TEPs and programme directors in 2012, with many key, emerging themes showing considerable overlaps. By 2018 evidence suggests that trading has become much more of a way of life for many more EP services. The same concerns remain but may be being encountered on a much more regular basis. The tone of responses from the few TEPs who replied to the 2018 survey appeared less anxious while acknowledging that dilemmas and difficulties are ever present. The issues below relate to TEPs but the themes are as important to EP services as they are to programme directors and TEPs themselves.

## **The power of the commissioner**

TEPs and programme directors need to be sensitive to the potential power imbalance where commissioners are purchasing services. TEPs may perceive they have limited choice in the negotiation of what they do and programme directors may need to be wary of the commissioners dictating TEPs' work at the expense of skill development. EPs have always had to negotiate what is appropriate and best practice in their day to day work, but within the current climate this is particularly pertinent.

## **Appropriate skill development**

As TEPs progress through their doctoral training there is a continuous increase in skill acquisition and their related confidence. Schools and other commissioners may not be aware of the particular skills acquired at a certain point in time, and so may have unreasonable expectations and make inappropriate demands upon TEPs. This may include requiring TEPs to complete work too quickly or undertaking work that is too complex for their skill level at that time. In addition TEPs may feel unable to challenge these demands and will need the support of their supervisor to come to a resolution.

## **A variety of TEP experience**

In accordance with the BPS accreditation criteria and standards of proficiency (BPS, 2012), TEPs are required to undertake a range of core professional competencies within a diverse range of settings. TEPs, supervisors and programme directors need to ensure that TEPs' experiences allow them to meet these requirements and are not compromised by commissioners' demands. It is anticipated that the framework to quality-assure EP services for TEPs' placements will overcome this issue. It is important that these criteria protect trainees from being expected to undertake a disproportionate amount and narrow range of work. Examples would be TEPs being repeatedly required to deliver a specific intervention or only completing statutory assessments.

## **Preparing for ethical trading**

It is crucial within this rapidly changing context that TEPs are taught skills to enable them to practice ethically within a traded service. Many of the skills which are perceived to be required to work in a traded context, such as negotiating work, marketing services and bringing an awareness of evidence-based interventions, are those that have underpinned EP training for many years. However, there are some who believe that some business-specific skills such as commissioning and marketing could be helpfully included on training courses. It could be argued that such topics would be suitable CPD topics for experienced EPs and EP managers who could also benefit from extending their knowledge and skills in this area.

## 4. Ethical communication

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In what follows, the key points relating to ‘ethical communication trading’ within a trading context have been linked to the four ‘ethical principles’ of the BPS *Code of Ethics and Conduct* (2018). It is considered that all of the existing statements under the four headings in the code will apply in a trading situation as much as they do in all aspects of a psychologist’s work.

In the context of trading, ethical communication will be facilitated through the following principles of good practice. These should cover the operations of service to service, service to employees and service to public as well as some general considerations for the individual EP.

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### 4.1 RESPECT

Consideration needs to be given within a traded context to:

- The extent to which a service should communicate directly to the community about its services, rather than waiting for the community to access the service given that this may result in a partial access situation, with those who contact the service being those most ‘confident’ about accessing such services.
- Ensuring communication with all clients is accessible, in terms of the content, form (e.g. written and oral reporting) and routes for access. This includes ensuring necessary translations and modifications are provided as required, so that all are equally aware of what is on offer. Communication with young people is essential to this, including hearing ‘the voice of the child’ and enabling this to happen. It is important when negotiating pieces of work that commissioners are aware of the time and cost implications of these.
- Acknowledging the implicit power relationships in any traded situation which may impact on the access to EP services of certain sections of the community.
- How the ethical bases of decision making with respect to honesty, accuracy and transparency are communicated including the prioritisation of pieces of work and the ethical use of resources including the deployment of assessment techniques. It is important that EPs are mindful of all of these as ethical issues in addition to financial considerations and the ‘product’ a commissioner may want.
- The possible need to break confidentiality where there are serious questions as to the legal and ethical aspects of a trading ‘situation’. Trading EPs need to be aware of safety/safeguarding issues, but also other wider ethical matters that may be raised in a trading context and which may require a breach of confidentiality.
- Being aware of potential conflicts of interest; for example, the client who is paying and the client whose confidentiality may not be totally guaranteed by the commissioner. In such instances there needs to be clear communication regarding the data storage and sharing of information, which must be written into the contract.
- Communicating clearly with any commissioner within a trading context that consent from the child or young person and their parents or carers must be freely given without any undue degree of persuasion used to obtain this.

### Good practice example

An EPS, moving into a semi-traded mode of delivery, extends its existing consultation protocols regarding work prioritisation to all negotiations regarding traded work, having made clear to commissioners that requests for such work would need to satisfy certain ethical standards.

The service is working on a pro-forma for commissioners in this area.

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## 4.2 COMPETENCE

It is essential that limits of competence and levels of qualification in a trading context are clearly communicated. The service should also communicate this as a factor that must be taken into account when any commissioner requests input from a single EP – that there may be limitations to the level of competence in all areas of practice that an EP can manage. EPs are encouraged to adopt an approach such as ‘I can’t but I know someone who can...’. Similarly it is important to communicate any limitations of EPs’ competencies including any specific practices requested by the purchaser.

### Good practice example

An EPS produces clear documentation of the levels of specialist work, including training, that it is competent to deliver and to what level.

Capabilities are illustrated in vignettes with supporting and representative comments from past users of these services.

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## 4.3 RESPONSIBILITY

Ethical practice can be supported within a shared value system communicated between managers and employees, to ensure mutual respect and effective and ethical communication regarding trading.

This should include open and two-way communication about how these values are embedded and what is expected regarding trading. The integrity of communication between manager and EPs in terms of clarity of expectations regarding trading outcomes is also important.

EPs and services need to be prepared to ask ethical questions of the commissioner including ‘Why is this piece of work necessary?’ Constant reflection on the ethics of ‘work selection’ in terms of economic value is required.

Open and honest communication must occur between all EPs and between them and all those with whom they work in a trading context, particularly where ‘private’ and LA EPs may be working in the same school, area or indeed with the same child/young person (albeit likely at different times).

### Good practice example

Senior managers of an EPS, mindful of the ethical sensitivities of EPs within the service regarding various aspects of trading activity such as trading ‘with those who can afford it’, encourages open and honest discussion between members of the service at team and service meetings as well as at the individual level such as in supervision.

### **Good practice example**

A private and an LA EP working in the same patch of schools, meet on a termly basis to discuss work they are carrying out in the area, being clear about the ethical basis of their activity in all respects and with a view to further discussion with schools as to how their services may dovetail to maximise the benefit to all.

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## **4.4 INTEGRITY**

Services and individual EPs could consider communicating via a statement or charter of their ethical practice regarding trading that would be available for all commissioners and would form the initial part of any clarification of the work to be done.

Reference to any ethical issues must also be made, for example, with respect to the prioritisation of work and equality of access. The ethics of work selection in terms of economic value to the EPS must be explicit.

The integrity of written and oral communications and their evidence bases are important in ensuring that these are a reflection of objective argument, rather than a possible biased opinion in the face of opposing views from a competitor in the market place. There are significant issues to consider in relation to the ethics of communication when trading, ensuring that honest and accurate information about the cost of services is available when one is establishing the processes and outcomes of work. EPs should communicate honestly about all that may be done in a trading context and what needs to be offered without charge, such as statutory assessment.

### **Good practice example**

An EPS moving into a traded model of delivery produces a new brochure of its activities and defines an ethical charter which is prominent in an early part of the publication.

## 5. Marketing and ethics

This section considers marketing in the context of the ethical guidelines from the BPS *Code of Ethics and Conduct* (2018) and the HCPC *Standards of Conduct, Performance and Ethics* (HCPC, 2016). The BPS code uses four helpful ethical principles: **respect**, **competence**, **responsibility** and **integrity**. In the context of ‘marketing’ there are two areas under consideration, namely advertising and charging.

### Introduction

Marketing is dynamic within the context of EP traded services, both LA and private practice. Marketing involves planning, analysis and control: it focuses attention towards the needs and wants of a market place. The distinguishing feature is the way in which marketing strives to provide ‘customer satisfaction’ without contravening principles of ethical practice. ‘Selling services’ triggers powerful and emotional individual political, social and cultural responses. The consequences of significant, recent political changes have a major impact on EPs’ working environments. The type of services demanded by consumers is a function of their social conditioning and their consequent attitudes and beliefs.

Two useful frameworks for considering EPs selling services is the ‘marketing mix’ (Table 1) and the strategic options for the delivery of services in the marketplace (Table 2).

Table 1: The marketing mix

<b>PRICE/COST</b> <ul style="list-style-type: none"><li>● Level</li><li>● Discount</li></ul>	<b>PROMOTION</b> <ul style="list-style-type: none"><li>● Advertising (web-based)</li><li>● Personal promotion</li></ul>
<b>SERVICES</b> <ul style="list-style-type: none"><li>● Product(s)</li><li>● Branding</li></ul>	<b>PLACE</b> <ul style="list-style-type: none"><li>● School</li><li>● Homes (clients/personal)</li><li>● Transport</li></ul>

This framework describes key areas to take into account when making marketing decisions: ethical considerations are relevant to all of these. The framework for ethical decision making included in the introduction to this guidance can be applied to all of these areas.

Table 2: Strategic options for the delivery of services in the marketplace

	New markets	Existing markets
New services	→	
New services	→	
Existing services	→	
Existing services	→	

This second framework is helpful in the strategic planning of service delivery both for EPSs and sole traders. It makes explicit whether or not a service will be offered to a new market and whether the service will be one the EPs already deliver or a new one. An example of how this can aid ethical decision making would be if an EPS chooses to offer a new service, CBT, to a provider for students aged 19–25. Decisions would need to be made about whether the service has the competencies to work with this age group and sector and also whether the EPs involved have the requisite skills in CBT. Other considerations would be whether there are already psychologists working in this sector and offering the same service; and whether EPs commissioned to deliver the CBT service will be able to receive adequate supervision and CPD in the new context. This framework can be applied to all of the five core functions of EP work cited in *Review of Provision of Educational Psychology Services in Scotland* (Scottish Executive, 2002): *consultation, assessment, intervention, training and research*.

## Advertising

The HCPC standards state: ‘You must make sure that any advertising you do is accurate’ (HCPC, 2016). A most important ethical consideration will be the ability to fulfil what is advertised and this relates both to the availability and to the competencies and skills of staff (psychologists). Competence is the second ethical principle in the BPS code and describes the importance of preserving our ability to function optimally within recognised limits of our knowledge, skills, training, education and experience (BPS, 2018). The BPS code outlines standards of ethical decision making, together with recognition of the limits of EP competence and any impairments resulting from a lack of competence. The HCPC standards reinforce this by stating that we must keep our professional knowledge and skills up to date and that we must act within the limits of our competency and, if necessary, refer to another practitioner. The HCPC also refers to limiting work or stopping practising if performance or judgement is affected by health. All the above ethical principles should be reflected in advertising EP services, for both LA EPSs and private practitioners.

Additionally, the HCPC standards state that you must act in the best interests of service users. Figure 2 is a useful aide memoire to support understanding of consumer or service user behaviour and Figure 3 highlights steps in the buyer’s decision-making process.



Figure 2: Consumer Behaviour

In the context of advertising, the HCPC standards state that we are personally responsible for making sure that we ‘promote and protect the best interests of service users’ and that we must work in partnership and treat service users with respect and dignity. Both the BPS and the HCPC stress the importance of behaving with honesty and integrity.



Figure 3: Steps in the buyer's decision-making process

## Charging

Commissioning is a key function currently within LAs, and is fundamental to the decisions about income generation work of EPSs.

A ‘tiered approach’ to charging might incorporate a transparent approach such as what is statutory or otherwise; whether the activity offers capacity building, delivers risk reduction or contributes to the development of new provision across the LA (e.g. applying psychology within additionally resourced provisions in mainstream schools) or whether it provides assessments, consultations or interventions for groups or individuals.

An example of adopting ethical principles for charging as an EP in private practice would be offering a reduced rate for single parents and/or low income families; providing an initial consultation with schools about future service delivery for free, providing discounts for higher level purchase.

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# Appendix

## Programme directors' responses to the ethical trading questionnaire

Outlined below are the main points which emerged from the programme directors' responses to three key questions:

<b>1. What are the main opportunities and concerns relevant to current and future TEPs on placement with settings where there is a trading arrangement (Year 1, 2, 3)?</b>	
<b>1.1</b>	<b>Balancing opportunities with threats</b>
<b>1.2</b>	<b>Opportunities</b> <ul style="list-style-type: none"> <li>● More placement providers;</li> <li>● More funding streams;</li> <li>● Wider variety of commissioned work including therapeutic work; and</li> <li>● Less reliance on statutory assessment and LA directed work.</li> </ul>
<b>1.3</b>	<b>Concerns</b> <ul style="list-style-type: none"> <li>● TEP will have limited learning opportunities e.g. <ul style="list-style-type: none"> <li>– training and systemic work;</li> <li>– lack of opportunities to carry out casework overtime; and</li> <li>– lack of opportunities to undertake necessary training activities.</li> </ul> </li> <li>● Inappropriate types of work being commissioned/purchased, e.g. <ul style="list-style-type: none"> <li>– not attuned to developmental needs of trainee (pace and duration);</li> <li>– too much complex casework; and</li> <li>– largely cognitive assessments.</li> </ul> </li> <li>● Headteacher control: <ul style="list-style-type: none"> <li>– headteachers will try to influence EP reports;</li> <li>– headteachers will only pay for EPs who will be compliant and will not pay for EPs to act as 'critical friends';</li> <li>– belief by the school that they can direct trainees' work: specifying what they want without a basis of accurate problem;</li> <li>– formulation or needs assessment;</li> <li>– belief by the school that the trainee is working for them not the child or young person;</li> <li>– TEP will feel pressure to give the 'buyer' what they want which may not be in the best interests of children, families.</li> </ul> </li> </ul>

<p><b>1.3</b> <i>cont.</i></p>	<ul style="list-style-type: none"> <li>● Quantity of work: <ul style="list-style-type: none"> <li>– LAs take on too much paid work and then put pressure on TEPs to deliver;</li> <li>– TEPs have been asked to put back their research to deliver traded work;</li> <li>– TEPs unduly pressurised; and</li> <li>– lack of cover for TEPs off sick.</li> </ul> </li> <li>● <i>Difficulties for training providers in monitoring placement:</i> This includes the range of experiences and also making judgements about placement quality against clear criteria. Are there appropriate experiences to acquire the necessary skills and demonstrate the required competences?</li> <li>● <i>Supervision:</i> <ul style="list-style-type: none"> <li>– Lack of appropriate supervision around traded services</li> <li>– Poor quality supervision</li> </ul> </li> <li>● <i>TEPs learning how to resist pressure:</i> <ul style="list-style-type: none"> <li>– TEPs have to resist pressure on occasions from service 'users' (e.g. schools) to act in the best interests of children.</li> </ul> </li> </ul>
<p><b>2. What additional skills and competencies will TEPs need to acquire during training to work effectively as EPs in trading settings?</b></p> <p><b>Ethical considerations need to be at the forefront of placement planning.</b></p>	
<p><b>2.1</b></p>	<p><b>TEPs need to learn to commission</b> e.g. negotiating directly with commissioners: being clear about what is wanted providing it in an ethical manner and addressing real needs.</p>
<p><b>2.2</b></p>	<p><b>Interventions to sell</b> Create knowledge of interventions that can be sold to schools/others.</p>
<p><b>2.3</b></p>	<p><b>Negotiating the boundaries and contracts, e.g.</b></p> <ul style="list-style-type: none"> <li>● What is/is not to be delivered;</li> <li>● 'Resisting bullying'.</li> </ul>
<p><b>2.5</b></p>	<p><b>Knowledge of service planning, e.g.</b></p> <ul style="list-style-type: none"> <li>● to secure priority outcomes, considering the ways in which resources can be increasingly focused on prevention and early intervention;</li> <li>● to provide an evidence base for practice which links with an understanding of 'outcomes' – making balanced decisions drawing on psychological theory, evidence of effectiveness and best practice.</li> </ul>
<p><b>2.6</b></p>	<p><b>Understanding of school and LA finance, e.g.</b></p> <ul style="list-style-type: none"> <li>● application of ethical frameworks and clear knowledge of accountabilities – marketing.</li> </ul>
<p><b>2.7</b></p>	<p><b>TEPs don't need to acquire additional skills and competencies – services do, e.g</b></p> <ul style="list-style-type: none"> <li>● Services need to negotiate contracts.</li> <li>● EPs have to make ethical decisions based on their judgement about what is their best course of action.</li> <li>● An awareness that ethical practice is important in traded services as well as in traditional.</li> </ul>

<b>3. What are the main implications of trading arrangements for your Applied Psychology Doctorate course?</b>	
<b>3.1</b>	<b>Part of the taught curriculum</b> This is part of the taught curriculum throughout the programme with particular emphasis in Year 3 regarding the ethical issues and prepare them for a workplace with an increasing commercial element. Programme directors need to prepare TEPs for 'exposure' to different trading practice arrangements.
<b>3.2</b>	<b>Nothing new</b> It has always been necessary to develop good dialogue with placement providers and prospective employers to ensure that placement activity does support coherent development of TEPs' knowledge and skills, ensure that placement work does contribute to service delivery and development and to the current and prospective priority needs of employers.
<b>3.3</b>	<b>The national placement accreditation</b> Criteria and process as an important safeguard and takes into account any trading arrangements with schools.
<b>3.4</b>	<b>Ensuring effective supervision of trainees, e.g.</b> Getting supervisors to attend university sessions for which they are not paid; ensuring trainees only work their contracted hours and protect study time.
<b>3.5</b>	<b>Codes of practice</b> Ensuring trainees abide by HCPC and BPS codes of practice.
<b>3.6</b>	<b>PEP demands</b> Ensuring PEPs do not ask trainees to operate outside of their competences for the sake of delivering a paid-for service.
<b>3.7</b>	<b>Supervision</b> Ensuring that if the TEP is working for an academy or a private company, that they are properly supervised and have a full range of experiences to meet the HCPC standards of proficiency and BPS competencies.
<b>3.8</b>	<b>Working with services</b> Services should be providing training placements to ensure that work load, range of work, and decision making standards are effectively applied.
<b>3.9</b>	<b>Different models of trading</b> Ensuring trainees are aware of how traded services are operating in different services and that they understand the implications of working for different types of service.
<b>3.10</b>	<b>An ethical awareness</b> TEPs to be aware that unethical practice does not lead to repeat business.
<b>3.11</b>	<b>An awareness of other models of practice</b> e.g. social enterprise.



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