

## Accredited Registers

### Conditions Review: COSCA (Counselling & Psychotherapy in Scotland)

January 2025

#### 1. Outcome

At COSCA's accreditation renewal, the Professional Standards Authority issued two (2) Conditions on its accreditation, both of which were to be completed by 5<sup>th</sup> December 2024 (see paragraphs 2.1 and 5.4 of the published outcome report).

This report sets out our assessment of the actions taken by COSCA to satisfy the Conditions.

We found that COSCA had met both Conditions 1 and 2.

#### 2. Background

We assess registers against our *Standards for Accredited Registers* ('the Standards')<sup>1</sup>. Where a Register has not met a Standard, we can issue Conditions. A Condition sets out the requirements and the timeframe that a Register must meet.

At COSCA's accreditation renewal, completed in September 2024, we issued two (2) Conditions (a full list is published on COSCA's directory page: [COSCA \(Counselling & Psychotherapy in Scotland\)](https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/standards-for-accredited-registers-(2021).pdf?sfvrsn=2fb94a20_1)). Conditions 1 and 2 had to be implemented by 5<sup>th</sup> December 2024:

1. COSCA should review its Sanctions Policy to include a clear outline of its process for restoring registrants to the Register following disciplinary action
2. COSCA should review its complaints guidance procedures to make provision for restriction on an interim order basis where there appears to be an immediate risk to the public

This report discusses the actions COSCA took to address the Conditions, as well as our decision about whether the Conditions have been met.

---

1. COSCA was originally assessed against our Standards for Accredited Registers in June 2014 [https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/standards-for-accredited-registers-\(2021\).pdf?sfvrsn=2fb94a20\\_1](https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/standards-for-accredited-registers-(2021).pdf?sfvrsn=2fb94a20_1)

We reviewed the following evidence:

- a) COSCA's reported actions about what it had done to meet Conditions 1 and 2.

### **3. Concerns leading to the Conditions**

#### Condition 1

- COSCA has a sanctions policy within its Complaints Procedure which makes reference to restoration of registrants following disciplinary action. However, the process for doing so was not clearly outlined. This issue had been raised as part of our query system. The Accreditation Panel was not satisfied that the current policy addressed the issue sufficiently.

#### Condition 2

- The Panel's careful review of COSCA's Complaints Procedure identified a gap that needed plugging: the absence of an interim orders process for dealing with a registrant who appears to pose an immediate risk to the public. It did not appear from COSCA's published guidance that they have a process for restricting practice on an interim order basis.

- 3.2 Further details can be found under Standards Two and Five of COSCA's accreditation renewal outcome report<sup>2</sup>.

### **4. Assessment of Conditions 1 and 2**

COSCA provided its response to the Condition on 19<sup>th</sup> November 2024.

#### Condition 1

COSCA submitted its response to the Conditions we issued at its last full accreditation renewal within the stipulated timelines of three months. COSCA has reviewed its Complaints Procedure and added a new section (Section 9), titled "Restoration of Registrants' Names to the Register", which was not previously there. Paragraph 9.1 under this new section provides for the restoration of registrants to COSCA's register following disciplinary action. Rather than subsume the new paragraph under Section 6 (Sanctions), COSCA decided to accord the issue greater salience by allocating to the new provision a separate section and clear heading. This is good practice, and it is welcome, as this accords greater prominence and visibility to the issue. In addition, and in full compliance with our Condition, COSCA has added a new Appendix (Appendix 4), which deals with the details of the process through which registrants are restored to the COSCA register following disciplinary action. We conclude, therefore, that Condition One is met and accordingly, Standard Two is now fully met.

---

<sup>2</sup> [240712 COSCA Panel Report Full Assessment \(Std 1-8\).pdf](#)

## Condition 2

COSCA's Complaints Procedure has been reviewed and consequently amended to make provision for restriction on an interim order basis in compliance with the requirement of Condition 2, which we issued at COSCA's full accreditation renewal in September 2024. The new additions to the Complaints Procedure on interim orders (Paragraph 1.3 and Appendix 2) speak directly to the concerns of the Condition: risk to the public, impact on public safety, and the potential for damage to public confidence in the Counselling profession. Appendix 2 is an expansion of Paragraph 1.3 and deals with the processes and management of interim suspension orders. In view of this, we conclude that Condition Two is met and accordingly, Standard Five is now fully met.

## 5. Conclusion

The evidence submitted by COSCA demonstrates that both Conditions have been thoroughly considered and met. A process for restoration following removal from the register has been introduced and references to it in the core complaints procedure are evident. The application of interim suspension orders is now specified in procedure and again are referenced in the core complaints documentation.

We, therefore, found that the two Conditions have been met, and as a result Standards Two and Five continue to be met. Accordingly, accreditation is fully confirmed with no outstanding conditions.

We wish to thank COSCA for such a prompt and resolute response to the Conditions.