

## Accredited Registers Impact Assessment

Accredited Register: UK Association of Humanistic Practitioners (UKAHPP)

Type of Review: Full renewal assessment

Period under review: 2022-2023

Date Approved for Panel: 28 March 2023

### Introduction

Before we make a decision about accreditation, we undertake an impact assessment to understand likely effects on different groups, and the wider health system. We begin to gather the information required for the impact assessment when a Register first applies for accreditation. We consider any changes to impacts when we renew accreditation, and when taking other decisions that affect accreditation status such as imposing Conditions or suspension.

A key part of the impact assessment is consideration of equalities. The Equality Act 2010 imposes a legal duty, the Public Sector Equality Duty on all public bodies to consider the equality impact of its policies and decision making. The duty is known as the Equality Duty and it requires a public authority, in the discharge of its function to consider the following three aspects which form the basis of the duty:

- Consider the impact and eliminate unlawful (direct or indirect) discrimination and any other conduct prohibited under the Equality Act 2010.
- Advance equality of opportunity between people with protected characteristics and those who do not share these characteristics
- Foster good relations between people with protected characteristics and those who do not share these characteristics.

This means that public bodies must consider equality impact on individuals protected under the Equality Act 2010 in carrying out their work. The Authority, therefore, needs to be always mindful of the public duty when carrying out its oversight role which includes the approving of registers. It needs to have 'due regard' to the needs to balance the three aspects which make up the Equality Duty when achieving its goals.

The Equality Impact Assessment is an important tool/mechanism for demonstrating 'due regard' through the consideration of evidence and analysis, actual and potential to identify positive and/or adverse impacts. The key groups we need to consider when making our decisions are, sex, age, ethnicity, disability, religion and belief, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy, and maternity.

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### Equalities impacts – summary

The UKAHPP advised that:

‘Accommodation of the principles of Equality, Diversity and Inclusion (incorporating Choice) are inherent within the philosophical underpinning of Humanistic Psychology and inform all aspects of UKAHPP decision making in respect of organisational governance and standards of practice including consideration of applications.’

This is demonstrated in its Code of Practice and Ethical Principles<sup>1</sup>:

1. ‘UKAHPP is committed to equality and the acceptance of all forms of difference among people.
2. Registrants undertake to develop their ability to offer a service that is equally respectful, accessible and beneficial to all people regardless of mental or physical disability, sexual orientation, race, colour, gender, age, class, religion, national origin, marital status, political or cultural beliefs, or any other preference, personal characteristic, condition or status.
3. UKAHPP Registrants actively seek to develop their understanding of issues of diversity and equalities through their training and continuing professional development activities.as these affect all aspects of their work. As no one is immune from unconsciously holding prejudicial attitudes, Registrants acknowledge the need for this continuing process of self-enquiry and professional development.
4. UKAHPP registrants do not practice, condone, facilitate or collude with any form of discrimination and undertake not to engage in any behaviour that is abusive or detrimental to any client or colleague based on discriminatory and prejudicial attitudes. They will challenge colleagues who appear to be acting in prejudicial and discriminatory way.’

All levels of registration must include Diversity and Equality within curriculum content of training programmes<sup>2</sup>. Higher levels of registration require curricula to include, for example ‘the importance of interdisciplinary dialogue and exploration, with emphasis on integration, respect for difference and an ability to work with diversity’. This reflects the UKAHPP’s alignment with the UK Council for Psychotherapy as an Accrediting Body<sup>3</sup>.

<sup>1</sup> <https://ahpp.org.uk/code-of-ethical-principles/>

<sup>2</sup> <https://ahpp.org.uk/registration-application/>

<sup>3</sup> <https://www.psychotherapy.org.uk/media/e4aijiuo/hipc-specific-standards-of-education-and-training.pdf>

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We were not sure if the UKAHPP collects information on the ethnicity or diversity status of registrants. Application processes do not require practitioners to provide data on protected characteristics or other information that may help identify impacts on registrants. The Authority's new Standard Nine: Equality, Diversity and Inclusion may direct the UKAHPP to start collecting registrant information to assess such impacts, if no specific mechanism is in place.

We have not seen evidence that the UKAHPP collects information on the use of humanistic therapies by different client-groups, including protected and non-protected groups. Such information may assist the UKAHPP to develop policies to address issues related to specific groups, and standards address specific risks.

During our review, we considered that the presence of an outdated website, which referred to previous UKAHPP functions of accrediting regulated arts/drama/music therapy titles, could cause confusion or blur boundaries to those with protected titles. The UKAHPP confirmed it no longer has such functions and is acting to remove the defunct website. We issued a Condition for the UKAHPP to take immediate action to remove the website and make a clear statement on its main website in the meantime.

We noted that a UKAHPP member's website stated that they were unwilling to work with clients possessing certain protected characteristics as they felt they lacked competence in these areas. We considered that registrants must be able to express limitations in a non-discriminatory way and that Accredited Registers should address such matters as they arise with guidance or disciplinary action as necessary. We issued a Condition for the UKAHPP to make clear that screening clients based on protected characteristics is unacceptable and could result in disciplinary processes.

We were also concerned that the UKAHPP did not make explicit reference to the risk of registrants practising conversion therapy. Conversion therapy is the term for therapy that assumes certain sexual orientations or gender identities are inferior to others and seeks to change or suppress them on that basis. The UKAHPP has since added a section to its Code making clear that the 'UKAHPP does not offer or provide Conversion Therapy'. We noted the action taken but considered that the UKAHPP should make clear that this applies to registrants' practice. We issued a Condition for the UKAHPP to amend that section of its Code of Practice to make clear that any registrants who offer or provide conversion therapy will be subject to disciplinary processes.

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### Impacts on groups with protected characteristics

#### All

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral	People with protected characteristics	We were concerned about the example of a UKAHPP registrant who appeared to screen potential clients based on protected characteristics.	We issued a condition for the UKAHPP to make clear that screening clients based on protected characteristics is unacceptable that may result in disciplinary action should it become aware of registrants doing so.	March 2023

#### Age

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral				

#### Disability

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Positive	People with anxiety	Anxiety may be a disability if it has a substantial and long-term adverse effect on peoples' ability to carry out		March 2023

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		<p>normal day-to-day activities. We noted evidence of a high rate of improvement for those engaging in therapy for depression and anxiety.</p> <p>Registrants are required to identify where referral to appropriate treatment, NHS Services, etc is required.</p>		
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### Gender reassignment

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral		<p>The UKAHPP's Codes state registrants 'offer a service that is equally respectful, accessible and beneficial to all people regardless of mental or physical disability, sexual orientation, race, colour, gender, age, class, religion, national origin, marital status, political or cultural beliefs, or any other preference, personal characteristic, condition or status'.</p> <p>We were however concerned that the UKAHPP appeared to have taken no</p>	<p>The UKAHPP has amended its Code of Practice to state that it does not offer or provide conversion therapy.</p> <p>We issued a Condition for the UKAHPP to make explicit that this applies to registrants' work.</p>	March 2023

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		public position on conversion therapies.		
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### *Marriage and civil partnership*

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral				

### *Pregnancy and maternity*

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral	Pregnant and postpartum women	People feeling anxious or depressed during pregnancy or after becoming a parent can also access NHS talking therapies services. This may include humanistic (Person Centred Experiential Treatment) therapies. <sup>4</sup>		March 2023

### *Race*

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral				

### *Religion or belief*

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral				

<sup>4</sup> <https://www.nhs.uk/mental-health/talking-therapies-medicine-treatments/talking-therapies-and-counselling/nhs-talking-therapies/>

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### Sex

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral				

### Sexual orientation

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral		<p>The UKAHPP's Codes state registrants 'offer a service that is equally respectful, accessible and beneficial to all people regardless of mental or physical disability, sexual orientation, race, colour, gender, age, class, religion, national origin, marital status, political or cultural beliefs, or any other preference, personal characteristic, condition or status'.</p> <p>We were however concerned that the UKAHPP appeared to have taken no public position on conversion therapy.</p>	<p>The UKAHPP has amended its Code of Practice to state that it does not offer or provide conversion therapy.</p> <p>We issued a Condition for the UKAHPP to make explicit that this applies to registrants' work.</p>	24/3/23



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### Cost and market impacts – summary

The UKAHPP’s humanistic psychotherapists and psychotherapeutic counsellors may work in private/self-employed settings, but also in education, charity/voluntary sector, within the NHS<sup>5</sup> and local authorities, or in other settings.

The UK government seeks to increase access to evidence-based talking therapies for people with common mental health problems, such as anxiety and depression through the Improving Access to Psychological Therapies (IAPT) Programme<sup>6</sup>. This includes the use of humanistic therapies such as person-centred experiential therapy (PCET)<sup>7</sup>.

People seeking talking therapies may self-refer, or be referred through their GP or other services<sup>8</sup>. They may use NHS, private services, or charities and voluntary organisations. Counselling may be offered for free, or ‘anywhere between £10 and £70’ per session<sup>9</sup>.

The Authority’s accreditation of the UKAHPP may encourage people to prefer services offered by its registrants, and also for mental health providers to refer to such registrants.

We noted that the UKAHPP has made its standards for registrants’ advertising more explicit in its codes to help assure that the public are properly informed and less likely to have unrealistic expectations about registrants’ services.

<sup>5</sup> <https://www.nhsinform.scot/tests-and-treatments/counselling-and-therapies/counselling-and-psychotherapy>

<sup>6</sup> <https://www.nice.org.uk/about/what-we-do/our-programmes/nice-advice/iapt>

<sup>7</sup> <https://iapt.rdash.nhs.uk/about-doncaster-iapt/individual-therapy/person-centred-experiential-therapy/>

<sup>8</sup> <https://www.nhs.uk/mental-health/talking-therapies-medicine-treatments/talking-therapies-and-counselling/nhs-talking-therapies/>

<sup>9</sup> <https://www.nhs.uk/mental-health/talking-therapies-medicine-treatments/talking-therapies-and-counselling/counselling/>



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### Social and environmental impacts – summary

Greater recognition of registrants on Accredited Registers, who are appropriately trained and meet standards of conduct, competence and business practice, may help increase access to mental health services and reduce risks of harm from seeing unregistered or unregulated practitioners.

### Decision

The Panel noted the above, and the Condition and Recommendations issued as part of the assessment.