

Accredited Registers Impact Assessment

Accredited Register: Accredited Register: British Association for Cognitive and Behavioural Psychotherapies BABCP and the Association of Rational Emotive Behaviour Therapy (AREBT) Cognitive and Behavioural Therapy (CBT) register

Type of Review: Initial

Period under review: N/A

Date Approved: 5 July 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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Impacts

Equalities impacts – summary

The British Association for Cognitive and Behavioural Psychotherapies and the Association of Rational Emotive Behaviour Therapy (BABCP/AREBT) has not historically collected data about protected characteristics from its registrants on the CBT register. However, they are planning to capture relevant data such as age going forward to help identify risks and opportunities in the delivery of CBT. BABCP's Standards Committee has also discussed collected data from complainants but decided that this could be perceived as a barrier to making a complaint and would be disproportionate given the low number of complaints currently received by the BABCP.

A report published by the Nuffield Trust in 2021.¹ considered the size and demographic of the psychological workforce. The report highlighted a number of barriers to becoming a psychologist, including race, disability and socio-economic background. The report found that some minority groups are less likely to progress in a psychology career within the NHS compared to others, that disabled undergraduate students are more likely to drop out of their psychology course and that men are less likely to pursue a career in psychology. The collection of relevant data from registrants on the CBT register will help the BABCP/AREBT identify potential barriers and possible opportunities to encourage people from all backgrounds into training for these roles and therefore gain access to the register.

The BABCP is a signatory of the *Memorandum of Understanding on Conversion Therapy*² which has been signed by 25 psychology, counselling, therapy and allied organisations and states that 'Organisations with practice members will ensure through training and/or published guidelines that the relevant over-arching ethical principles in their statements of ethical practice are understood and applied when working with sexually and gender diverse clients, as pertaining to the basic standards of honest, competent and non-discriminatory practice to which clients of all identities and orientations are entitled.'

¹ <https://www.nuffieldtrust.org.uk/research/the-right-track-participation-and-progression-in-psychology-career-paths>

² <https://www.bps.org.uk/guideline/memorandum-understanding-conversion-therapy-uk>

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One of BABCP's values is Diversity, Inclusion and collaboration, BABCP provided examples of how it is demonstrating this including its Diversity and Equalities statement published on its website³. BABCP has an Equality and Culture Special Interest Group⁴ which has several aims including 'To promote equality, cultural competence and diversity in CBT practice, training and research' and 'Increase understanding of the barriers to services and promote equal access.' This is a member led group and is open to all members. BABCP also developed specific groups such as its Women and Gender special interest group and its neurodiversity special interest group. BABCP has an EDI action plan which includes internal focussed actions such as reviewing all their policies and procedures to ensure they do not disadvantage any individual or community as well as external engagement such as including relevant articles in 'CBT Today' a BABCP publication for members. BABCP also highlighted guidance it had produced such as '*IAPT Black Asian and Minority Ethnic Service User Positive Practice Guide*.⁵

The AREBT has also published an *Equality, Diversity and Inclusion Policy* on its website⁶ which is aimed at 'organisation to be truly representative of all sections of society: including our membership and the public, and for each Board member, paid or voluntary employee or AREBT member to feel respected and able to give their best.'

Impacts on groups with protected characteristics

Age

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
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³ <https://babcp.com/About/Diversity-Equalities>

⁴ <https://babcp.com/Membership/Special-Interest-Groups/Equality-and-Culture>

⁵ <https://babcp.com/Therapists/BAME-Positive-Practice-Guide>

⁶ <https://www.arebt.one/policies/arebt-equality-diversity-and-inclusion-policy/>

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Positive	Young people	Registrants will work with people at all ages including children and young people. The majority of the registrants on the CBT register will be employed and will therefore have relevant checks through their employers. There are a small percentage that are self-employed. The BABCP/AREBT will be meeting with the DBS following discussions with the AR team to discuss how they can implement checks for private practitioners.	Following the completion of the Authority's consultation on DBS checks, we will update the registers on any new requirements. This may result in registers needing to make changes.	6 October 2022
Positive	Young People	Three of the roles on the register work specifically with children. The EBPT role is not currently covered by the programme bringing these roles under the Accredited Registers programme provides further assurance to service users and employers.	No action required	6 October 2022

Disability

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
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Positive	Those with poor Mental Health	These roles form part of the wider mental health workforce in the UK covering a range of different intensity interventions. The wellbeing roles allow low intensity interventions to be tried and care to be stepped up if needed. Bringing these roles under the Accredited Registers programme provides further assurance to service users and employers.	No Action required	6 October 2022
Positive	Those with a disability who are or want to be psychologists	A report published by the Nuffield Trust in 2021. ⁷ considered the size and demographic of the psychological workforce. The report highlighted a number of barriers to becoming a psychologist, including race, disability and socio-economic background. The report found that some minority groups are less likely to progress in a psychology career within the NHS compared	The Collection of relevant data from the Wellbeing workforce on the CBT register will help the BABCP/AREBT identify risks and opportunities for these groups.	6 October 2022

⁷ <https://www.nuffieldtrust.org.uk/research/the-right-track-participation-and-progression-in-psychology-career-paths>

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		to others, that disabled undergraduate students are more likely to drop out of their psychology course and that men are less likely to pursue a career in psychology.		
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Gender reassignment

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Positive		The BABCP is a signatory of The Memorandum of Understanding on Conversion Therapy (MOU) . Signed by 25 psychology, counselling, therapy and allied organisations.	No Action required	6 October 2022

Race

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Positive	Those from a Black or Asian background who are or want to be	A report published by the Nuffield Trust in 2021. ⁸ considered the size and demographic of the psychological workforce. The report highlighted a number of barriers to becoming a psychologist, including	The Collection of relevant data from the Wellbeing workforce on the CBT register will help the BABCP/AREBT identify risks and opportunities for these groups.	6 October 2022

⁸ <https://www.nuffieldtrust.org.uk/research/the-right-track-participation-and-progression-in-psychology-career-paths>

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	psychologists or CBT practitioners.	race, disability and socio-economic background. The report found that some minority groups are less likely to progress in a psychology career within the NHS compared to others, that disabled undergraduate students are more likely to drop out of their psychology course and that men are less likely to pursue a career in psychology.		
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Sexual orientation

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Positive		The BABCP is a signatory of The Memorandum of Understanding on Conversion Therapy (MOU). Signed by 25 psychology, counselling, therapy and allied organisations.	No Action required	6 October 2022

Cost and market impacts – summary

BABCP/AREBT does not envisage that there will be increased costs due to accreditation, however noted that this may need to be reviewed in light of the changes made by the Authority to the fee structure.

Registration with either the BABCP or the British Psychological Society (BPS) will be a requirement for PWPs CWPs and EMHPs employed by NHS England & Improvement (NHSE&I), this could result in increased costs for those PWPs, CWPs and EMHPs who are not currently

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registered. This requirement could also mean that any registrants who are removed from the register through the BABCP's complaints procedures or through processes such as its CPD audit could find themselves unemployed. As a result, it is important that the BABCP has robust procedures in place. This requirement however has been introduced by NHSE&I and is thought necessary to protect the public and will ultimately drive up standards in these roles. It is hoped that employers will start to add registration as a requirement for employment for the other roles going forward.

We have identified one other register who will be registering roles the PWP roles, the BPS which is an Accredited Register. There is a possibility that registrants may decide to move between organisations. Registrants who are removed from the BABCP for conduct issues will not be able to join the BPS, the two organisations have a data sharing agreement which will allow the two registers to share information about complaints and their outcomes. No other market impacts have been identified.

Social and environmental impacts – summary

Accreditation through the programme will provide employers with further reassurance that practitioners have met its registration standards including education and training.

Decision

The Accreditation Panel noted the actions above and considered the Conditions and Recommendations highlighted as part of the assessment. The Accreditation Panel agreed with these actions.