

# Accredited Registers Notification of Change

Association of Christians in Counselling  
and Linked Professions (ACC)

April 2025

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# The Notification of Change Process

The Professional Standards Authority (PSA) accredits registers of practitioners in health and social care occupations that are not regulated by law. Accreditation ensures these registers meet the [Standards for Accredited Registers](#), promoting effective operation, good practice, and public protection.

Accredited Registers are [subject to annual checks](#) to confirm they continue to meet the Standards. However, registers must notify the PSA of significant changes that could affect their compliance through the [Notification of Change \(NOC\)](#) process.

Our criteria for assessing NOCs considers:

- The Standard(s) potentially affected
- Potential public protection issues
- Impacts on public confidence in the register
- Effects on the governance of the register

We must also consider whether this changes the impact of our accreditation on:

- Persons who are, or are eligible to be, included in the register.
- Employers of registrants.
- Service users, including those with protected characteristics under the Equality Act 2010.

## How We Assess a Notification of Change

When a register submits a NoC, we first determine whether the change affects compliance with the Standards.

If it does not, we may:

- Accept the change with no further action
- Accept the change with Recommendations

If a change may impact compliance, we refer it to an Accreditation Panel, which may:

1. Accept the change
2. Accept the change with Conditions and/or Recommendations
3. Not accept the change at this time, with reasons specified
4. Adjourn to request further information
5. Suspend or remove Accreditation

# The SCoPEd framework

Six Accredited Registers for counselling and psychotherapy occupations: the Association of Christian Counsellors (ACC), the British Association for Counselling and Psychotherapy (BACP), the British Psychoanalytic Council (BPC), the Human Givens Institute (HGI), the National Counselling Society (NCS), and the UK Council for Psychotherapy (UKCP) have established a collaborative partnership to develop the [Scope of Practice and Education \(SCoPEd\) framework](#).

The SCoPEd framework outlines minimum core training, practice, and competence requirements for counsellors and psychotherapists working with adults. These requirements are mapped into three columns: A, B, and C, representing different levels of professional practice:

- Column A: Core training, practice and competence requirements
- Column B: Enhanced training, practice and competence requirements
- Column C: further enhanced training, practice and competence requirements

As the framework columns map the minimum standards evidenced, therapists can practise competences from other columns, and move between the columns, where they have the right skills, knowledge, training and experience to do so.

The framework is intended to reflect the diversity of training, approaches, and philosophies within counselling and psychotherapy roles. It aims to:

- Provide clarity for practitioners regarding progression pathways aligned with training and experience.
- Assist commissioners and employers in understanding the competencies associated with each level for workforce planning.
- Enhance public understanding to aid informed decisions when seeking services.
- Establish clear standards to ensure safe and competent practice.

## Update on the SCoPEd Partnership

In April 2025, after we completed our assessment, we were informed that the SCoPEd partnership has been renamed the Partnership of Counselling and Psychotherapy Bodies (PCPB). This change reflects how the partnership's work has expanded beyond the SCoPEd framework.

The PCPB notified us about their new website ([www.pcpb.org.uk](http://www.pcpb.org.uk)) and minor updates to the SCoPEd framework. They have also created a policy and strategic engagement group to develop relationships with key stakeholders.

As this information came after our assessment of the ACC's adoption of the SCoPEd framework was complete, we have not reviewed these developments as part of this report.

# Notification of Change

The Association of Christian Counsellors (ACC) has adopted the SCoPEd framework and has mapped its registration categories to the three columns of the framework:

- **Registered Counsellor (Column A):** Counsellors at this level must complete at least 300 hours of training, including a Level 4 diploma or above. They are qualified to provide counselling within the scope of their training and experience.
- **Accredited Counsellor (Column B):** Accredited Counsellors evidence advanced practice through further professional development and 450 hours of supervised practice.
- **Senior Accredited Counsellor (Column C):** The highest level, Column C, encompasses practitioners who evidence competencies for working with complex needs, including chronic conditions. The ACC plans to implement this level by 2026, with criteria for registrants to progress or transfer into this tier.

Currently, ACC members can progress only as far as Column B (Accredited Counsellor). The pathway to Column C (Senior Accredited Counsellor) is still under development and will be available by 2026. The ACC has established different accreditation routes that take into account varying training backgrounds and professional experience.

The ACC has also created a process for practitioners who are already registered with other SCoPEd partner organisations to join the ACC register. These practitioners can apply for dual registration at their equivalent SCoPEd level, including Column C if applicable. All ACC registrants, regardless of their route to registration, must demonstrate competence with The Churchill Framework, which addresses working with clients' religious and spiritual issues in clinical practice.

## The Outcome

We have assessed the Association of Christian Counsellors' (ACC) adoption of the SCoPEd framework and concluded that it continues to meet the Standards for Accredited Registers.

The ACC's implementation of the framework introduces a more structured approach to recognising practitioners' competencies at different levels through the creation of new accreditation categories. Currently, the ACC has pathways for Registered Counsellors (Column A) and Accredited Counsellors (Column B), with plans to implement Senior Accredited Counsellors (Column C) by 2026..

While we acknowledge that the SCoPEd framework has generated considerable discussion across the profession, the ACC has approached its implementation in a measured way, with a focus on supporting members through the transition and creating accessible pathways for progression through the columns.

The ACC has committed to collaborate with other partner registers on the continued development and implementation of the framework, including participating in the partnership's governance structures and sharing best practice.

Following our assessment, we concluded that the change did not impact compliance with any of the Standards for Accredited Registers. Therefore, the Notification of Change was accepted without referral to a Panel.

We issued the ACC the following **Recommendations**:

1. To address outstanding concerns regarding accreditation pathways, the ACC should publish its updated Accreditation and Senior Accreditation Guidelines, including clear timelines for implementation, as soon as possible.
2. The ACC should work with SCoPEd partner registers to provide a shared, clear summary of the framework tailored to different audiences, as recommended in the Independent Impact Assessment. This will help ensure registrants, service users, and stakeholders can understand the framework and its implications.

# The Register

This section provides an overview of the ACC and its register.

<b>Date first Accredited</b>	March 2015
<b>Type of Organisation</b>	The Association of Christians in Counselling and Linked Professions (ACC) is a Christian professional membership organisation for those involved in counselling/psychotherapy and linked professions, i.e. pastoral care, coaching and spiritual direction, in the UK. The ACC holds a national register of counsellors who are Christian.
<b>Overview of Governance</b>	The ACC is a registered charity <a href="#">1018559</a> and a company limited by guarantee ( <a href="#">2791541</a> ). The ACC is made up of a Board of nine trustees and an independent <a href="#">Register Advisory Panel (RAP)</a> 'who hold ACC to account to show that the standards for entry to the Register are upheld including the maintenance of the register and how it deals with receiving and investigating complaints through its professional complaints procedure.'
<b>Overview of the aims of the register</b>	<p>The ACC advises their purpose is to:</p> <ul style="list-style-type: none"> <li>• Promote safe, competent, ethical and accountable practice for counselling and linked professions</li> <li>• To resource individuals and communities for quality relationships, restoration and healing</li> <li>• To encourage exploration of psychological and theological insights into wellbeing and growth.</li> <li>• To empower individuals through connecting people with safe professionals, and colleagues with shared professions and faith.</li> <li>• Support students in training and professionals in their development, and in their life events through prayer.</li> <li>• Provide guidance and training for safe, competent, ethical and accountable practice in counselling and linked professions and encourage exploration of and research on psychological and theological insights into wellbeing and growth.</li> <li>• Work with other professional bodies, stakeholders and churches as we believe that we work better together.</li> </ul>

<b>Register Website</b>	<a href="http://acc-uk.org">Home - ACC UK (acc-uk.org)</a>
<b>UK countries in which Register operates</b>	England, Northern Ireland, Scotland and Wales
<b>Role(s) covered</b>	Counsellor, Supervisor, Counselling Organisations and linked professions, i.e. pastoral care, coaching and spiritual direction.
<b>Number of registrants</b>	969 (as of 1 January 2025)
<b>Main practice settings</b>	ACC registrants may work within private settings, within the NHS and other settings including charities and within Church settings and/or teams.
<b>About the patients and service users</b>	People seeking 'counselling, psychotherapy and pastoral care' with the benefit of a Christian (or otherwise religious) perspective.



# Assessment against the Standards

## Standard One: Eligibility and public interest

- 1.1 This Standard ensures that the organisation holds a register of people in health and/or social care roles that do not have to be regulated by law. The register must demonstrate that the activities carried out by registrants are beneficial to public health and wellbeing, and that any risks associated with these activities are justifiable and effectively mitigated. The organisation must also ensure that registrants do not make unproven claims or otherwise mislead the public.

### 1a) Eligibility of the Register under our legislation

- 1.2 The ACC continues to operate as a voluntary register for roles that are not subject to statutory regulation, aligning with the requirements under the Health and Social Care Act 2002. The adoption of the SCoPEd framework does not change this status. Instead, it provides a structured means of defining professional competencies for counsellors who are Christian. This could enhance clarity regarding the roles registered, potentially improving understanding among clients, employers, and other stakeholders about the competencies and scope of practice associated with these roles.

### 1b) Public Interest Considerations

- 1.3 We considered whether the ACC's register continues to operate in the public interest following adoption of SCoPEd, with focus on three key areas:
- 1.4 **Evidence of Benefit:** The benefits provided by registrants' activities are anticipated to remain consistent under the SCoPEd framework. By clearly defining practitioner competencies across levels, the framework may enhance public understanding and accessibility. This could support clients to make informed decisions and reinforce public trust in the occupations registered.
- 1.5 Concerns have been raised that changes resulting from the SCoPEd framework could impact the availability and delivery of different therapeutic approaches, particularly regarding access to person-centred therapy and other relational approaches within healthcare settings, including the NHS. While the Authority does not make judgments about the relative merits of different therapeutic approaches or philosophies, we must consider the impact of our accreditation and how this could affect public protection and services.
- 1.6 The SCoPEd partnership has responded to concerns, for example in "question and answers" sections published on partner-register websites. The ACC has posted its own updates and has hosted the [Final Report on the Impact Assessment of the SCoPEd Framework](#) which "took into account a variety of viewpoints, including critical voices from those within counselling

and psychotherapy, some of whom were contacted due to their specific skills and experience, including professional networking and campaign groups".

- 1.7 **Mitigation of Risks:** No new practice risks have been identified as arising from the adoption of the SCoPEd framework. However, feedback from registrants highlights ongoing concerns regarding professional titles and competencies, particularly around the distinction between "counsellors" and "psychotherapists." These disputes raise potential risks to public understanding if stakeholders perceive inconsistency or bias in how roles and qualifications are represented.
- 1.8 To address these risks, the SCoPEd partnership has established collaborative governance structures to standardise the application of competencies across participating bodies, provided detailed registration and accreditation criteria, and developed clear guidance to help registrants navigate the framework without undermining public confidence in their professional standing.
- 1.9 **Claims and Representations:** No new risks of misrepresentation have been identified. The ACC only registers practitioners under the Counsellor title (as Registered or Accredited, and in future, Senior Accredited). The ACC's Code of Ethics and Practice requires members to provide "honest and accurate" information about their services that "avoids unjustifiable claims" and maintains "the good standing of the counselling profession." The ACC has published clear registration criteria on its website, promoting transparency and mitigating potential risks of misrepresentation.
- 1.10 We concluded that the ACC continues to meet this Standard following its adoption of the SCoPEd framework. The revised competencies provide additional clarity for clients, employers, and stakeholders, demonstrating that the activities carried out by registrants could be beneficial. The structured pathways for registrant accreditation and career progression mitigate potential risks by ensuring practitioners meet competencies required for safe and effective practice.

## Standard 2: Management of the register

- 2.1 This Standard ensures that the organisation maintains and publishes an accurate register of those who meet its requirements including any restrictions on their practice.
- 2.2 We considered how the ACC has updated its register in response to the adoption of the SCoPEd framework, ensuring that registrants are clearly identified according to their mapped competency levels.
- 2.3 The ACC's adoption of the SCoPEd framework means that all registrants must meet the minimum requirements of 'Column A' to register, as well as the specific competencies of the Churchill Framework, which addresses working with clients' religious and spiritual issues.

- 2.4 The ACC public register continues to indicate the level of registration for all practitioners, including name, grade of registration, PIN, location and any active sanctions. This information is also provided on individual directory profiles, which allow registrants to advertise their services, areas of expertise, and client groups.
- 2.5 The ACC has aligned its registration and accreditation processes with the SCoPEd framework through several mechanisms:
- 2.6 For initial registration (Column A), applicants must have completed a minimum Level 4 diploma in counselling accredited by a recognised UK body, with primarily in-person training including at least 300 guided learning hours and a 100-hour supervised clinical placement.
- 2.7 For advancement to Column B (Accredited), the ACC has developed a two-stage process requiring submission of application materials evidencing training, supervised practice, and written assignments, followed by a mandatory viva assessment.
- 2.8 For dual registration of practitioners from other Accredited Registers, the ACC has created a recognition application that allows counsellors accredited with other SCoPEd partners to join at their equivalent level without repeating assessment processes.
- 2.9 The ACC has set a timeline for full implementation of SCoPEd requirements by January 2026, allowing training providers to align their programmes with the framework.
- 2.10 We noted that the ACC offers Equivalence Criteria for practitioners trained outside of the UK or without standard Level 4 diplomas, providing alternative routes to registration that remain compatible with the SCoPEd framework.
- 2.11 We identified one area where additional clarity could benefit registrants and strengthen the ACC's registration processes, and issued the following Recommendations:
- To address outstanding concerns regarding accreditation pathways, the ACC should publish its updated Accreditation and Senior Accreditation Guidelines, including clear timelines for implementation, as soon as possible.
- 2.12 We concluded that the ACC continues to meet this Standard following its adoption of the SCoPEd framework, with one recommendation to strengthen transparency about registration categories and progression pathways.

### **Standard 3: Standards for registrants**

- 3.1 This Standard ensures that the organisation sets appropriate standards for competence, professional and ethical behaviour, and business practice.

- 3.2 We considered how the ACC has aligned its standards for registrants with the SCoPEd framework and whether this alignment affects the expectations for safe, ethical, and effective practice.
- 3.3 The adoption of the SCoPEd framework formally aligns the ACC's existing standards with Columns A, B and C of the framework's competency structure. The ACC registers counsellors at Column A level, who can then advance to Columns B and eventually C (when implemented by 2026).
- 3.4 The ACC has stated on its website that it has adopted the SCoPEd Framework for adults alongside the Churchill Framework for working with clients' religion and spirituality. Unrelated to SCoPEd which relates to work with adults, the ACC also references BACP's competency and curricula framework for working with children and young people. These frameworks together provide the minimum standards of competence expected of registrants.
- 3.5 SCoPEd defines competencies required for safe, effective, and ethical practice, providing detailed expectations for each stage of professional development. These competencies are supported by the ACC's existing requirements for continuing professional development, supervision, and safeguarding practices.
- 3.6 While SCoPEd does not directly influence the ACC Code of Ethics and Practice, it reinforces professional responsibility by requiring registrants to "work within the limits of their competence." The framework does not impact business practices such as data confidentiality, complaint handling, or indemnity insurance, which continue to be managed under the ACC's established processes.
- 3.7 We concluded that the ACC continues to meet this Standard following its adoption of the SCoPEd framework. The alignment with SCoPEd could enhance clarity for practitioners, clients and commissioners, and reinforce professional responsibilities and defined scopes of practice.

#### **Standard 4: Education and training**

- 4.1 This Standard ensures that the register sets clear and appropriate education standards for the role(s) it registers and ensures registrants can identify when referral to another health or social care professional may be necessary.
- 4.2 The adoption of the SCoPEd framework aligns the ACC's education and training standards with nationally recognised benchmarks, including the National Occupational Standards (NOS) Framework.
- 4.3 The ACC's basic training standards for entry to the register have not changed. The register continues to require applicants to have completed, at minimum, a Level 4 diploma in counselling or psychotherapy validated by recognised UK educational bodies, with at least 300 direct tutor contact hours, primarily face-

to-face delivery, and a supervised clinical placement of no less than 100 hours. These criteria align with SCoPEd Column A competencies.

- 4.4 The ACC has indicated that training providers are expected to revise their syllabuses in line with the SCoPEd framework by 2026. After this transition period, counsellors applying to the Register will need to have completed training that maps into the SCoPEd framework, allowing direct entry to the register at A, B or C-equivalent grades.
- 4.5 In the interim, the ACC will continue to accept registration applications from practitioners registered with other accredited bodies that have comparable systems of registrant accreditation.
- 4.6 The SCoPEd framework explicitly requires registrants to understand their professional boundaries and know when referral to other professionals is appropriate, stating the need for "ability to recognise own professional limitations, and in collaboration with clients or patients and other professionals as appropriate, manage the process of referral during assessment and throughout therapy."
- 4.7 During our assessment, we noted that concerns had been raised about the framework's potential impact on different therapeutic approaches, particularly humanistic and relational modalities. The SCoPEd framework has been revised to address these concerns by integrating core relational competencies across all columns, including empathy, therapeutic relationship qualities, and self-awareness.
- 4.8 The ACC clearly communicates information about its training requirements on its website, including how these align with the SCoPEd framework.
- 4.9 We concluded that the ACC continues to meet this Standard following its adoption of the SCoPEd framework. The framework's alignment with national benchmarks supports registrants in practising within their competence and understanding when referral to other professionals is appropriate.

#### **Standard 5: Complaints and concerns about registrants**

- 5.1 This Standard ensures that the organisation has robust processes in place for ensuring that concerns about registrants are dealt with in a transparent, timely, and fair way.
- 5.2 The SCoPEd framework does not change how the ACC handles complaints about registrants.
- 5.3 We checked the ACC's complaints handling processes, including their [public-facing guidance on raising concerns about registrants](#).
- 5.4 The SCoPEd framework adds standardised competencies that might help when assessing complaints about competence. This could make complaint

handling more consistent and help other registers understand ACC's decisions about competency matters.

- 5.5 We concluded that the ACC continues to meet this Standard following its adoption of the SCoPEd framework. The standardised competencies defined in the framework may provide useful reference points when handling complaints related to scope of practice and professional competence.

## **Standard 6: Governance**

- 6.1 This Standard ensures that governance of the organisation operating the register supports public protection and promotes transparency, integrity, and accountability.
- 6.2 The adoption of the SCoPEd framework introduced a shared competency framework across the participating organisations. While this required collaboration and oversight mechanisms across the partner bodies, it did not require changes to the governance structure of the ACC or its register.
- 6.3 The ACC is governed by a Board of Trustees responsible for strategic governance and oversight, alongside a Register Advisory Panel (RAP) that ensures standards for entry to the Register are maintained.
- 6.4 The SCoPEd framework's governance has evolved over time, with the initial Steering Group and Expert Reference Group being replaced in 2024 by four coordinating bodies: a CEO Board providing strategic leadership, a Delivery Group implementing agreed actions, a Clinical Group maintaining framework standards, and a Communications Group managing stakeholder engagement.
- 6.5 The ACC's February 2024 update indicates significant progress in implementation structures and stakeholder engagement. The partners have established regular update mechanisms including Q&A events, appointed Experts by Experience to provide service user perspectives, and are developing a minimum data set using protected characteristics as a guiding framework. A partner website and stakeholder engagement group are being developed to enhance transparency and communication.
- 6.6 Feedback gathered during the Share Your Experience (SYE) process highlighted some concerns about governance and engagement across the partnership, including perceived lack of transparency in decision-making, questions about the representation of diverse therapeutic modalities, and concerns about how additional organisations might join the partnership.
- 6.7 These concerns have been addressed through multiple rounds of consultation, revisions to the framework to better integrate diverse therapeutic approaches, conducting an independent Impact Assessment, providing regular communications updates, and expanding the partnership from three to six organisations (including the ACC).



- 6.8 We concluded that the ACC continues to meet this Standard following its adoption of the SCoPEd framework. While the ACC's own governance structures remain largely unchanged, its participation in the SCoPEd partnership's collaborative governance has been managed through appropriate oversight mechanisms.

#### **Standard 7: Management of the risks arising from the activities of registrants**

- 7.1 This Standard ensures that the organisation has a thorough understanding of the risks to service users and the public presented by the activities undertaken by its registrants and takes action to mitigate them.
- 7.2 The SCoPEd framework defines competencies in three columns (A, B, and C), providing a structure that can help identify and manage risks associated with practitioners working beyond their training or scope of practice.
- 7.3 We considered the risk that practitioners in Columns B or C might lack the required competencies for advanced practice. The ACC addresses this through:
- Development of robust Accreditation and Senior Accreditation pathways requiring practitioners to demonstrate alignment with SCoPEd-defined competencies
  - Clear ethical requirements for all practitioners to operate within their scope of practice, including the ability to "recognise own professional limitations, and in collaboration with clients or patients and other professionals as appropriate, manage the process of referral during assessment and throughout therapy"
- 7.4 The framework assists in mitigating risks to public protection by providing transparency about practitioners' capabilities. Public-facing information outlines the scope of practice for each column, helping service users make informed decisions when selecting practitioners.
- 7.5 The ACC register provides the grade of registration within its register and find-a-counsellor search function. Information about the ACC's alignment to the SCoPEd framework is available on its website.
- 7.6 We concluded that the ACC continues to meet this Standard following its adoption of the SCoPEd framework. The framework's structure could assist the ACC to manage risks associated with counselling and psychotherapy practice.

#### **Standard 8: Communications and engagement**

- 8.1 This Standard ensures that the organisation provides clear and accessible information to the public, its registrants and other stakeholders about itself, the role(s) it registers, and about the accredited registers programme. It uses

engagement with relevant stakeholders to inform and enhance public protection.

- 8.2 We considered whether the ACC has communicated the development and implementation of the SCoPEd framework clearly to its stakeholders.
- 8.3 The Independent Impact Assessment commissioned by the SCoPEd partnership found that clients and commissioners valued the framework's clarity in helping them make informed choices and plan their workforce needs. It also recommended developing concise, jargon-free summaries tailored to different audiences to improve understanding.
- 8.4 The ACC has provided information about its adoption of SCoPEd through dedicated sections on its website. These explain the framework and how it relates to ACC's registration categories. The ACC has also shared updates in the news section of its website and incorporated references to the framework in its registration and accreditation requirements.
- 8.5 As part of the SCoPEd partnership, the ACC participates in the Communications Group, which helps coordinate consistent messaging across all partner registers.
- 8.6 We issued the following **Recommendation** encouraging the ACC to continue to develop its communication of the framework:
- The ACC should work with SCoPEd partner registers to provide a shared, clear summary of the framework tailored to different audiences, as recommended in the Independent Impact Assessment. This will help ensure registrants, service users, and stakeholders can understand the framework and its implications.
- 8.7 We concluded that the ACC continues to meet this Standard following its adoption of the SCoPEd framework. The ACC has engaged with registrants and other stakeholders to communicate the changes arising from its adoption of the framework.

## Standard 9: Equality, Diversity and Inclusion

- 9.1 This Standard ensures that the organisation demonstrates its commitment to equality, diversity and inclusion and ensures that its processes are fair and free from unfair discrimination.
- 9.2 We considered how the ACC has incorporated Equality, Diversity and Inclusion (EDI) principles in implementing the SCoPEd framework, including its accreditation processes for Columns B and C.
- 9.3 The ACC's requirement for a Level 4 diploma in counselling or psychotherapy, validated by Ofqual or equivalent bodies, establishes an accessible entry point for registration. This relatively low threshold, compared to registers that may



require Level 5 or 6 qualifications, provides opportunities for a broader range of individuals to enter the profession at SCoPEd Column A.

- 9.4 The ACC offers Equivalence Criteria to accommodate practitioners without a standard Level 4 diploma, including those trained internationally. Applicants can demonstrate equivalency through evidence of comparable training, supervised clinical practice, and CPD, with international qualifications assessed and mapped against SCoPEd competencies.
- 9.5 The ACC's accreditation process (to reach SCoPEd Column B) does not require additional formal qualifications but focuses on practical experience and competency evidence. This approach could reduce financial barriers associated with further education.
- 9.6 The ACC provides mentoring support for counsellors advancing from Column A to Column B, to help them navigate the accreditation process. This supportive approach could benefit applicants from underrepresented backgrounds who may lack access to informal professional networks.
- 9.7 The ACC has begun collecting EDI data from registrants, which will help them monitor impacts of the framework on different demographic groups. This aligns with recommendations from the Independent Impact Assessment, which highlighted the need for improved data collection across the partnership.
- 9.8 The SCoPEd framework itself incorporates EDI competencies across all columns, requiring registrants to understand and apply equality legislation, work in a non-discriminatory manner, and reflect on their own identity and cultural values in relation to professional practice.
- 9.9 Feedback from the SYE process identified some concerns about potential inequities in accreditation pathways across the partnership, particularly for practitioners with non-traditional qualifications or those affected by financial barriers. The SCoPEd Impact Assessment recommended enhanced demographic data collection and continued development of EDI monitoring systems, which the ACC is working to implement.
- 9.10 We concluded that the ACC continues to meet this Standard following its adoption of the SCoPEd framework. The register has demonstrated evidence of EDI commitment through its accessible entry requirements, flexible equivalence criteria, and participation in partnership-wide initiatives to address barriers to inclusion.

### Share your experience

- 10.1 As part of our assessment, we invited stakeholders, including registrants, service users, employers, and professional bodies, to contribute their views regarding the ACC's adoption of the SCoPEd framework. The consultation

took place from 10 April 2024 to 17 May 2024 and gathered feedback on the framework's development, implementation, and perceived impact.

### **Consultation Responses**

- 10.2 We received nearly 200 responses to our consultation, providing detailed insights into stakeholder perspectives on the SCoPEd framework. The response breakdown was:
- Approximately 5% positive responses
  - Around 70% critical responses
  - 25% neutral or unclear responses
- 10.3 While most responses addressed the SCoPEd framework broadly rather than the ACC specifically, they highlighted recurring concerns and opportunities for improvement.

### **Themes Identified**

#### **1. Positive Perspectives**

- 10.4 Some respondents believed that the adoption of SCoPEd could raise standards and support informed decision making:
- "The SCoPEd classifications are clear and transparent... Psychotherapists should be classified consistently across all registers to provide consistency and clarity to clients."
  - "I think it's important to show the differences in counselling and psychotherapy training and practice, and I believe it will overall raise standards of training."

#### **2. Transparency and Consultation**

- 10.5 Concerns were raised about a perceived lack of meaningful consultation during the framework's development, with some registrants reporting feeling excluded from decision-making processes. The SCoPEd partnership responded to such concerns through consultation, significant revisions based on feedback, and enhanced communication channels.
- 10.6 The ACC joined the partnership in 2021, which helped broaden representation of therapeutic approaches in the framework's development. The January 2022 revision incorporated greater emphasis on therapeutic relationships and practitioner qualities in response to feedback.

#### **3. Progression Pathways and Equality**

- 10.7 Concerns were raised about potential barriers for practitioners from non-traditional training routes or lower socioeconomic backgrounds. As the ACC has introduced a new Senior Accredited category, which presently is only open to Column C members of other registers, its registrants have not

experienced "demotion" concerns raised by some practitioners from other registers.

- 10.8 The ACC's accreditation processes allow for recognition of prior learning and alternative means of demonstrating competencies, which could reduce financial barriers associated with formal qualifications.

#### **4. Cross-Register Consistency**

- 10.9 Feedback highlighted questions about how qualifications and experience are recognised across different partner registers. The SCoPEd partnership has established governance structures to promote consistency in the application of standards, though more work may be needed to clearly communicate these processes to stakeholders.

#### **5. Practitioner Well-being**

- 10.10 Some respondents reported stress and anxiety associated with the changes introduced through the framework's implementation. The ACC has provided training, resources, and support for members during the transition period.
- 10.11 While the SYE feedback does not indicate that the implementation of SCoPEd has caused a failure to meet the Standards, it highlights areas where continued attention is needed to sustain confidence in the framework. These include ongoing stakeholder communication, consistent application of standards across partner registers, and equitable access to progression pathways.
- 10.12 The ACC has demonstrated commitment to addressing these areas through its implementation approach and participation in partnership-wide initiatives. We will continue to monitor how these efforts develop over time.

#### **Impact assessment (including Equalities impact)**

- 11.1 We are required by Section 25H of the National Health Service Reform and Health Care Professions Act 2002 to carry out an impact assessment before accrediting a register. In line with this, we assessed the likely impacts of the ACC's adoption of the SCoPEd framework. Our assessment considered the effects on registrants, employers, service users, and individuals with protected characteristics under the Equality Act 2010, in compliance with the Public Sector Equality Duty (PSED).
- 11.2 The SCoPEd framework organises competencies into three clear practice levels (Columns A, B, and C). This structure aims to help service users, registrants, employers, and commissioners better understand the qualifications and skills expected at each level, helping everyone make informed decisions about therapy services. The framework also promotes equality, diversity, and inclusion (EDI) by requiring practitioners to demonstrate competencies that reflect and respect diverse backgrounds and needs.

- 11.3 For example, all columns (A, B, and C) require registrants to demonstrate competencies such as:
- Understanding and applying equality legislation
  - Incorporating diversity considerations in ethical decision-making
  - Working in a non-discriminatory manner
- 11.4 The Independent Impact Assessment commissioned by the SCoPEd partnership highlighted several positive outcomes expected from the framework's adoption:
- Increased clarity about training requirements, roles, and competencies
  - Benefits for therapists, clients, commissioners, and employers through standardised understanding
  - Potential to address existing inequalities within counselling and psychotherapy professions
- 11.5 During our assessment, we identified areas of concern raised by stakeholders, including:
- Perceptions that the framework might favour certain therapeutic approaches over others
  - Potential barriers for practitioners from non-traditional training routes or lower socioeconomic backgrounds
  - Questions about consistency in how the framework is applied across different partner registers
- 11.6 The ACC has taken steps to address these concerns through:
- Developing accreditation pathways that recognise prior learning and experience
  - Creating flexible evidence requirements that accommodate different ways of demonstrating competence
  - Beginning to collect demographic data to monitor impacts on different groups
- 11.7 Our recommendations to enhance transparency about registration categories and accreditation guidelines aim to further mitigate these concerns by ensuring clear information is available to all stakeholders.

We concluded that adopting the SCoPEd framework does not present an unaddressed negative impact that would affect the ACC's compliance with the Standards. However, to ensure positive outcomes, it is essential that registrants' concerns continue to be reviewed, stakeholder engagement is strengthened, and data collection systems are enhanced to monitor the long-term impact of the framework effectively.