

# Accredited Registers Notification of Change

British Association for  
Counselling and Psychotherapy

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:

- Accept the change
- Accept the change with Conditions and/or Recommendations
- Not accept the change at this time, with reasons specified
- Adjourn to request further information
- 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 BACP's adoption of the SCoPEd framework was complete, we have not reviewed these developments as part of this report.

# Notification of Change

The BACP has aligned its registration categories with SCoPEd's three columns:

- **Registered Member MBACP (Column A):** This category includes practitioners who have completed BACP-accredited training or passed the Certificate of Proficiency. It represents entry-level competence for delivering safe, ethical counselling for clients with lower-complexity needs.
- **Registered Member MBACP (Accred) (Column B)** This category recognises practitioners with additional training and experience. It denotes competence in working independently with moderately complex client needs, integrating evidence-based approaches and ethical reasoning.
- **Registered Member MBACP (Snr Accred) (Column C):** This category identifies senior practitioners with extensive experience and advanced skills. It signifies expertise in managing complex cases, providing supervision, and contributing to the profession through leadership or specialised practice.

BACP registrants can demonstrate their experience and advanced competencies by gaining accreditation. To support its registrants during its adoption of the framework, the BACP has introduced transitional accreditation pathways from February 2024 to January 2026:

- Accredited and Senior Accredited members can move to their corresponding SCoPEd columns without charge.
- From February 2026, a new accreditation pathway will allow practitioners to demonstrate competencies based on professional experience and prior learning, rather than solely through academic qualifications.

BACP has identified and is addressing several potential risks during this transition:

- Practitioner anxiety about the changes, particularly regarding the recognition of existing senior accreditation.
- Concerns about financial and practical barriers faced by practitioners from disadvantaged backgrounds or those with accessibility needs.

In response to these concerns, BACP has put in place:

- Financial assistance for members experiencing hardship.
- Alternative application methods, such as audio transcription, to help members who have accessibility requirements.
- A dedicated Inclusion Officer to support members with additional needs during the accreditation process.

We have considered these concerns, and the actions taken, in the following assessment.

## The Outcome

We recognise adoption of the SCoPEd framework as a significant change for the BACP. While it introduces substantial modifications to the register, our assessment concludes that the BACP continues to meet the Standards for Accredited Registers.

We acknowledge that the framework has generated considerable discussion within the profession, with practitioners expressing concerns about:

- Potential movement towards a more medicalised approach to therapy
- The creation of potential hierarchies within professional practice
- Perceptions of insufficient consultation during framework development
- Potential barriers for practitioners navigating the new assessment processes

Acknowledging these concerns, the BACP has demonstrated a commitment to addressing stakeholder feedback through:

- Comprehensive communication strategies
- Transitional support mechanisms
- Efforts to maintain inclusivity across different therapeutic approaches

We issued the BACP the following **Recommendations**:

1. The BACP should publish clear guidance on how it assesses and recognises qualifications from both partner and non-partner registers. This will ensure transparency in how practitioners from other registers can demonstrate they meet BACP's accreditation standards.
2. The BACP 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, and continue strengthening ongoing engagement through advisory forums to address stakeholder concerns.

# The Register

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

<b>Date first Accredited</b>	5 March 2013
<b>Type of Organisation</b>	The BACP is a company limited by guarantee registered in England and Wales (company number 02175320), BACP also incorporates BACP Enterprises Ltd (company number 01064190). The BACP is a registered charity in England (number 298361)
<b>Overview of Governance</b>	<p>The BACP is managed through a <a href="#">Board of Governors</a>, and six board-delegated committees:</p> <ul style="list-style-type: none"> <li>• Audit, Risk and Performance Committee</li> <li>• Finance and Policy Committee</li> <li>• Membership and Professional Standards Committee</li> <li>• Public Protection Committee</li> <li>• Remuneration and Governance Committee</li> <li>• Research Committee</li> </ul> <p>The day to day management of the organisation is carried out by a <a href="#">Senior Management Team</a>.</p> <p>The BACP's <a href="#">Public Protection Committee (PPC)</a> 'supports the functions of the BACP Register, including professional conduct and entry and maintenance of registration. It holds delegated responsibility for developing the public protection strategy.'</p> <p>The PCC is made up of five members, three of which are lay members, and is supported by the Registrar and Assistant Registrar. It has four strategic goals:</p> <ol style="list-style-type: none"> <li>1. Effective Regulation</li> <li>2. Effective and efficient delivery</li> <li>3. Communications and engagement</li> <li>4. Research</li> </ol>
<b>Overview of the aims of the register</b>	<p>Information about BACP is published on its <a href="#">website</a>. This webpage states that the BACP's charitable objectives are to:</p> <ul style="list-style-type: none"> <li>• 'Promote and provide education and training for counsellors and psychotherapists working in either professional or voluntary settings, whether full or part</li> </ul>

	<p>time, with a view to raising the standards of the counselling professions for the benefit of the community and in particular for those who are the recipients of counselling or psychotherapy</p> <ul style="list-style-type: none"> <li>inform and educate the public about the contribution that the counselling professions can make generally and particularly in meeting the needs of those whose participation and development in society is impaired by physical or psychological health needs or disability.'</li> </ul>
<b>Register Website</b>	<a href="https://www.bacp.co.uk/">https://www.bacp.co.uk/</a> <a href="https://www.bacp.co.uk/search/Register">https://www.bacp.co.uk/search/Register</a>
<b>UK countries in which Register operates</b>	All four UK Countries.
<b>Role(s) covered</b>	Counsellors and psychotherapists
<b>Number of registrants</b>	55473 (as of 1 January 2025)
<b>Main practice settings</b>	Registrants may work in private practice, or in public/private employment including within the NHS.
<b>About the patients and service users</b>	Service users can be any age, gender or race. Some service users may have other long term health issues or disabilities.



# 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.
- 1.2 We assessed whether BACP's adoption of the SCoPEd framework affected its ability to meet this Standard. Our evaluation focused on how the framework clarifies qualifications and competencies for entry and progression within the register. We also examined stakeholder concerns about potential impacts on therapeutic diversity, public understanding of professional roles, and accessibility for practitioners from varied training backgrounds.

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

- 1.3 The BACP's register remains a voluntary register under the Health and Social Care Act 2002, as counsellors and psychotherapists are not subject to statutory regulation. The adoption of the SCoPEd framework does not change this status. Instead, it provides a structured means of defining professional competencies, ensuring transparency in qualifications and experience required for practice at different levels. The register remains open to individuals who have completed a BACP-accredited training course or passed its Certificate of Proficiency.

### 1b) Public Interest Considerations

- 1.4 We considered whether the BACP's register continues to operate in the public interest following adoption of SCoPEd by ensuring that registrants' activities are beneficial, risks are managed, and the public is not misled.
- 1.5 **Evidence of Benefit:** The benefits provided by registrants' activities are expected to remain consistent under the SCoPEd framework. By clearly defining practitioner competencies across levels, the framework may enhance public understanding and accessibility, supporting informed client decision-making and reinforcing trust in the profession.
- 1.6 Some stakeholders raised concerns that the SCoPEd framework could impact access to person-centred and other relational therapies, particularly within healthcare settings like the NHS. The BACP's adoption of SCoPEd provides a structured competency framework that may influence how therapy services are commissioned and delivered. While we do not evaluate the effectiveness

of specific therapeutic approaches, we recognise that these changes have implications for the accessibility of therapeutic services.

- 1.7 The SCoPEd framework states that it is designed to be inclusive of diverse therapeutic approaches, including relational and humanistic modalities. The framework outlines core competencies shared across modalities, such as ethical decision-making and responsiveness to client diversity, which are foundational to relational approaches. In response to concerns about potential impacts on service delivery, the framework has taken several steps.
- 1.8 The updated January 2022 framework increased emphasis on the therapeutic relationship and practitioner qualities, ensuring that empathy, warmth, and rapport are recognised as foundational competencies across all columns. The language has been refined to be more inclusive and accessible, representing diverse therapeutic modalities more effectively. Additionally, the framework explicitly provides pathways for therapists to progress between columns through training, experience, and professional development, rather than solely through academic qualifications.
- 1.9 While these measures indicate efforts to address concerns from humanistic and relational modality practitioners, explicit mechanisms for evidencing prior learning, such as recognition of prior learning (RPL) or structured portfolio assessments, are not yet fully detailed in publicly available materials. Under Standard Two, we have recommended that further clarification and implementation of these pathways are necessary to ensure fair access and balanced representation of therapeutic approaches.
- 1.10 **Mitigation of Risks:** No new risks to practice have been identified as a result of the adoption of the SCoPEd framework. However, feedback from registrants highlights concerns around professional titles and competencies, particularly 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. To address these risks, the BACP, as part of the SCoPEd partnership, has taken steps to:
  - Establish collaborative governance structures to standardise the application of SCoPEd competencies across participating bodies, reducing the potential for conflicting interpretations.
  - Provide clear registration and accreditation criteria on the BACP website to clarify qualifications and competencies associated with each membership category.
  - Develop transitional pathways and guidance to ensure that registrants can navigate the framework without undermining public confidence in their professional standing.

- 1.11 **Avoiding Misleading Claims:** No new risks of misrepresentation have been identified. The BACP's public-facing materials focus on its own registration categories while aligning with the common standards outlined in the SCoPEd framework. This supports consistency across partner registers and ensures transparency. The BACP has published detailed registration and accreditation criteria on its website, mitigating potential risks of misrepresentation. We will continue to review these materials for clarity and accuracy throughout the transition period and beyond.
- 1.12 We concluded that the BACP continues to meet this Standard following its adoption of the SCoPEd framework.
- 1.13 While the SCoPEd framework introduces significant changes, the BACP's approach suggests a careful attempt to balance professional development with public protection. We recognise that the framework has generated genuine concerns among practitioners about professional identity and progression pathways.
- 1.14 We will closely monitor how these changes manifest in practice, understanding that the impact of such a comprehensive framework cannot be fully anticipated at implementation. Our ongoing assessment will focus on ensuring that public protection remains paramount, while allowing the profession space to evolve and adapt.

## **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 BACP 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 BACP's register now reflects the alignment of its membership categories with the SCoPEd columns. Registered Members (MBACP) are aligned with Column A, Accredited Members (MBACP Accred) with Column B, and Senior Accredited Members (MBACP Snr Accred) with Column C. The intention is that this alignment will help service users, employers, and registrants understand the qualifications and competencies associated with each registration level.
- 2.4 The public register remains accessible online and allows users to verify a registrant's status, including any disciplinary actions or restrictions on practice. The BACP has updated its systems to maintain transparency during this transition.
- 2.5 The BACP has introduced transitional accreditation pathways to help registrants align with the new framework. These include a temporary scheme

that allows accredited and senior accredited members to move to their respective SCoPEd columns without charge. From February 2026, an experience-based accreditation route will also be available, allowing practitioners to show their competencies through professional experience and prior learning.

- 2.6 Feedback from stakeholders raised concerns about how the framework may impact perceptions of professional identity, particularly among those without Level 7 qualifications, required to transfer to Column C. The BACP has responded by ensuring that professional development pathways remain accessible through experience-based accreditation and recognition of prior learning, mitigating potential barriers to progression.
- 2.7 The transitional accreditation period allows current accredited and senior accredited members to align with their corresponding SCoPEd columns without additional cost. An experience-based accreditation route will be introduced in 2026, ensuring registrants can demonstrate competencies through prior learning and professional experience rather than solely academic qualifications.
- 2.8 We noted that the processes for recognising qualifications from other registers, including those in the SCoPEd partnership, are not yet fully transparent. Clear mechanisms for assessing and verifying such qualifications would help registrants navigate cross-registration pathways and assist employers and the public in understanding equivalencies across registers. To address this we issued the following **Recommendation**:
- The BACP should publish clear guidance on how it assesses and recognises qualifications from both partner and non-partner registers. This will ensure transparency in how practitioners from other registers can demonstrate they meet BACP's accreditation standards.
- 2.9 We concluded that the BACP continues to meet this Standard following its adoption of the SCoPEd framework.

### **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 BACP has aligned its standards for registrants with the SCoPEd framework and whether this alignment affects the expectations for safe, ethical, and competent practice.
- 3.3 The SCoPEd framework introduces a structured alignment of registrants' competencies across three levels (Columns A, B, and C) based on training, experience, and scope of practice. This provides clearer definitions of professional expectations at different stages of a registrant's career and enhances transparency in professional development pathways.

- 3.4 The BACP has mapped its existing membership categories to the framework, ensuring that standards for competence and professional behaviours align with the corresponding column requirements. This mapping allows registrants to demonstrate progression through training, professional development, and experience.
- 3.5 The BACP Ethical Framework for the Counselling Professions remains the core professional conduct standard for registrants. While the adoption of the SCoPEd framework does not alter the Ethical Framework, it supports registrants in operating within the limits of their qualifications and experience by providing a structured pathway for competency development.
- 3.6 We concluded that the BACP continues to meet this Standard following its adoption of the SCoPEd framework. We will continue to monitor the BACP's communication about how professional standards align with the framework, ensuring clarity for registrants, employers, and the public..

#### Standard 4: Education and training

- 4.1 Standard Four ensures that the register sets clear and appropriate education standards for the roles it registers and ensures registrants can identify when referral to another health or social care professional may be necessary.
- 4.2 The BACP registers practitioners who have successfully completed a BACP-accredited training course or have passed its [Certificate of Proficiency](#). The BACP's training requirements, and their connection to the SCoPEd framework is clearly set out on [its website](#).
- 4.3 Adoption of the framework aligns the BACP's education and training standards with nationally recognised benchmarks, including the [National Occupational Standards \(NOS\) Framework](#).
- 4.4 The SCoPEd framework explicitly requires registrants to understand their professional boundaries and know when referral to other professionals is appropriate.
- 4.5 During our assessment, we acknowledged concerns raised regarding the potential impact of the framework on certain therapeutic modalities, specifically person-centred and other relational or humanistic approaches. We noted that the framework addressed these concerns by embedding core relational competencies such as empathy, relational skills, and reflective practice throughout all levels of the framework.
- 4.6 We concluded that the BACP continues to meet this Standard following its adoption of the SCoPEd framework. The framework's alignment with national benchmarks, and its specification of when referral to other professionals is appropriate, supports registrants in practising within their competence. The recommendation noted under Standard Two, to provide clearer guidance on

qualification assessment, would further strengthen transparency around training pathways and progression routes.

#### **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 BACP handles complaints about registrants.
- 5.3 We checked the BACP's complaints handling processes, including their public-facing guidance on [How to complain about a BACP member](#).
- 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 BACP's decisions about competency matters.
- 5.5 We concluded that the BACP 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 Adoption of the SCoPEd framework required collaboration and oversight across the participating organisations, but did not require changes to BACP's existing governance structures.
- 6.3 SCoPEd's governance structure included a Steering Group, comprising CEOs of the partner registers responsible for strategic decisions, and an Expert Reference Group providing professional and academic advice to ensure rigour.
- 6.4 Concerns raised with us included a perceived lack of transparency and adequate representation of diverse therapeutic modalities in the Expert Reference Group. People also raised questions about how additional organisations might join the partnership or independently apply the framework.
- 6.5 We noted the actions taken by the SCoPEd partnership to address these concerns. They conducted multiple rounds of consultation to ensure a wide range of voices were heard, revised the framework to better reflect diverse therapeutic approaches, including relational and humanistic modalities. They also commissioned an independent Impact Assessment, which recommended



establishing inclusive forums such as a “What Works” group, aimed at ensuring ongoing engagement and balanced representation. Additionally, direct communication channels, such as dedicated emails and live events, were used to improve transparency and keep practitioners informed throughout the transition period.

- 6.6 We concluded that the BACP continues to meet this Standard following its adoption of the SCoPEd framework. While the BACP's own governance structures remain largely unchanged, its participation in the SCoPEd partnership's collaborative governance has been managed through appropriate oversight mechanisms. The concerns raised about transparency and representation are being addressed through established channels for stakeholder engagement and do not affect compliance with this Standard.

### **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). This structure could help identify and manage risks when practitioners work beyond their training or scope of practice.
- 7.3 We considered the risk that practitioners in Columns B or C might lack competencies for advanced practice. BACP addresses this through:
- Accreditation and Senior Accreditation Pathways: Practitioners must demonstrate alignment with SCoPEd-defined competencies as part of these processes.
  - Transition arrangements - Registrants transitioning to new categories are required to provide evidence of their competencies during the implementation phase. This includes recognition of prior learning, qualifications, and professional experience.
  - Ethical framework - All practitioners must work within their scope of practice and refer appropriately
- 7.4 The framework could assist public protection by making practitioners' capabilities clearer. The public-facing information explains what each column means, helping people choose practitioners.
- 7.5 We concluded that the BACP continues to meet this Standard following its adoption of the SCoPEd framework. The framework's clearly defined competencies for each column help identify and manage risks related to scope of practice. The BACP's accreditation processes require practitioners to demonstrate appropriate competencies before practicing at more advanced levels, which supports public protection. SCoPEd's public-facing information

about practitioner capabilities further assists service users to make informed choices.

## 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. Its uses engagement with relevant stakeholders to inform and enhance public protection.
- 8.2 We considered whether the BACP has communicated the development and implementation of the SCoPEd framework clearly, noting concerns which considered that the BACP had not demonstrated sufficient transparency before and after its decision to adopt.
- 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 We considered concerns raised about the inclusivity of stakeholder engagement and the perception that governance decisions around the framework lacked transparency. In response, BACP has increased the frequency of its communications and created additional channels for engagement, including member consultations, email updates, and publications in professional journals.
- 8.5 We reviewed BACP's communications and found that it has taken steps to address concerns about transparency through various measures. These include providing detailed information on how the framework integrates with its register categories, issuing regular updates for registrants and external audiences, and outlining transitional accreditation pathways.
- 8.6 The BACP website hosts dedicated SCoPEd pages, which include timelines, frequently asked questions (FAQs), and updates on accreditation schemes, along with guidance and support for new and existing registrants. Registrants have received targeted emails clarifying how their membership categories align with the SCoPEd columns and links to additional guidance.
- 8.7 Registrants were also supported through live events providing opportunities to raise questions directly, supplemented by on-demand resources for broader accessibility. A dedicated email address and customer service helpline were also established to help address registrants' queries during the transition.
- 8.8 We issued the following **Recommendation** encouraging the BACP to continue to develop its communication of the framework:



- The BACP 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, and continue strengthening ongoing engagement through advisory forums to address stakeholder concerns. This will help ensure registrants, service users, and stakeholders can understand the framework and its implications.
- 8.9 These steps, as highlighted in the Independent Impact Assessment, will help ensure registrants can navigate the framework effectively, and provide structured opportunities for feedback and dialogue.
- 8.10 We note that the Independent Impact Assessment recommended establishing forums such as the “What Works” group and stakeholder forum to facilitate ongoing dialogue about the framework's implementation. We encourage the BACP to consider these recommendations as they continue to develop their engagement strategy. Such forums could provide valuable spaces for diverse voices within the profession to contribute to the framework's evolution and ensure it remains responsive to the needs of practitioners, service users, and the broader therapeutic community.
- 8.11 We found that the SCoPEd framework does not affect BACP's compliance with this Standard. We will continue to monitor the BACP's communications and engagement strategies to ensure that registrants, service users, and other stakeholders receive clear, accessible information about the framework and have meaningful opportunities for feedback.

## **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 BACP has incorporated Equality, Diversity and Inclusion (EDI) principles in implementing the SCoPEd framework, including its transitional accreditation processes and broader measures to support accessibility.
- 9.3 The BACP outlined actions taken to promote EDI, including reviewing accreditation criteria for accessibility, providing financial and procedural support for registrants with disabilities, and collecting demographic data to identify and address disparities in registration outcomes.
- 9.4 A peer review group was convened to assess accreditation criteria, ensuring that language and formats were inclusive and easy to navigate. The BACP also introduced financial support mechanisms, such as reduced application fees and reimbursements for accessibility-related expenses (e.g., assistive technology and proofreading services). A pilot programme for audio versions

of application forms was also tested successfully and is planned for broader implementation.

- 9.5 The BACP has begun collecting demographic data, including protected characteristics, to analyse diversity among applicants and monitor success rates during the transition to SCoPEd. This analysis is expected to inform adjustments ensuring equitable outcomes for registrants.
- 9.6 The BACP has introduced an experience-based accreditation route, allowing practitioners to achieve senior accreditation by presenting a portfolio demonstrating prior learning, training, and professional experience. This aims to recognise diverse pathways to competence and mitigate inequities for registrants without formal Level 7 qualifications.
- 9.7 The SCoPEd framework integrates EDI competencies across all levels, ensuring that registrants demonstrate knowledge and application of equality legislation, work in a non-discriminatory manner, and reflect on their own identity and cultural values in professional practice.
- 9.8 The Share Your Experience (SYE) process highlighted significant concerns about perceived inequities in the accreditation pathways. Respondents expressed worries about barriers faced by practitioners from non-traditional backgrounds, particularly those with limited financial resources or non-standard qualifications. While the BACP has introduced measures to address these concerns, ongoing monitoring and adaptation will be crucial to ensure the framework truly supports diversity and inclusion within the profession.
- 9.9 We concluded that the BACP continues to meet this Standard following its adoption of the SCoPEd framework. However, the effectiveness of these measures will depend on continued robust data collection, careful analysis of demographic information, and a willingness to adapt processes to address any identified disparities in access and progression.

## 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 BACP'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 Response Overview

- 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 feedback addressed the SCoPEd framework broadly, a significant portion of responses specifically mentioned the BACP or the impact of its policies on its categories of registration. This was not unexpected given that BACP is substantially larger than other partner registers, representing a greater proportion of practitioners affected by the framework's implementation.

### **Key themes and actions taken by the BACP**

#### **Transparency and Consultation Concerns**

10.4 In response to feedback about consultation processes, the partnership had provided:

- Dedicated SCoPEd web pages with detailed information
- Frequent email updates and segmented communications
- Live Q&A events and on-demand resources
- Establishment of a dedicated SCoPEd email address and helpline

#### **Impact on Senior Accredited Status**

10.5 Noting concerns from senior accredited practitioners about professional recognition, the BACP introduced:

- No-cost transitional pathways for current senior accredited members
- Free alignment to Column C during the transition period
- Planned experience-based accreditation routes post-2026
- Preservation of specialist accreditation statuses (e.g., Child and Young People, Supervision)

#### **Equity and Accessibility**

10.6 The SCoPEd partnership had already identified and addressed potential barriers to progression through:

- Financial assistance schemes
- Reduced application fees
- Alternative application formats (e.g., audio transcription)
- Dedicated Inclusion Officer support
- Comprehensive plans for collecting and analysing demographic data
- Experience-based accreditation routes

#### **Practitioner Well-being**

10.7 Recognising the stress and uncertainty expressed by practitioners, the partnership implemented

- Comprehensive communication strategies
- Dedicated support channels
- On-demand resources
- Live support events

### Alignment with PSA Standards

10.8 During our assessment we considered how these concerns could impact on our the BACP's ability to meet the Standards, for example:

- **Standard 1 (Public Protection):** Addressing risks to public understanding through clearer communication
- **Standard 6 (Governance):** Improving transparency in decision-making processes
- **Standard 9 (Equality, Diversity and Inclusion):** Implementing supportive measures for diverse practitioners

10.9 We noted the BACP has undertaken significant work to address the concerns of its registrant. We however recognise that continued effort is required to:

- Improve stakeholder communication
- Ensure clear and accessible accreditation processes
- Monitor and address ongoing accessibility concerns
- Maintain an open dialogue with the profession

10.10 We noted the recommendations of the Independent Impact Assessment which for example recommended establishing a 'What Works' group to provide a constructive space for ongoing dialogue and continuous improvement of the framework.

### Conclusion

10.11 The Share Your Experience consultation revealed complex, nuanced perspectives on the SCoPEd framework. BACP's responsive approach demonstrated their commitment to addressing concerns while maintaining the framework's core objectives of enhancing professional standards and clarity.

10.12 We will continue to monitor the implementation of the SCoPEd framework, ensuring that public protection remains paramount and that the interests of all stakeholders are carefully considered.

### 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<sup>1</sup>. In line with this, we assessed the likely impacts of the BACP'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 During our assessment, we identified areas of concern raised by stakeholders, including:
- Practitioners feeling anxious about the changes, especially senior accredited members concerned about their professional status.
  - Financial and other barriers that might affect practitioners from non-traditional backgrounds, including those with protected characteristics or limited financial resources.
  - Potential confusion around how qualifications from different registers will be recognised, affecting opportunities for employment or progression.
- 11.4 To manage these concerns, the BACP has put specific support measures in place. These include financial help for registrants facing difficulties, pathways for practitioners to evidence their competencies through experience rather than formal qualifications alone, and accessibility measures such as audio application options and dedicated inclusion support.
- 11.5 We recommended actions to further address these concerns, including:
- Making it clear how the BACP recognises qualifications from other registers, so practitioners understand the pathways available to them
  - Creating accessible explanations of the framework that different groups (like clients, employers, and practitioners) can easily understand
- 11.6 We also support the suggestions from the Independent Impact Assessment about gathering better data on who is accessing the framework and creating opportunities for ongoing discussion about how it's working. These steps would help ensure the framework is fair and inclusive for all practitioners.

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<sup>1</sup> [Accredited Registers Impact Assessment Guidance Sheet](#)

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- 11.7 We concluded that adopting the SCoPEd framework did not present an unaddressed negative impact that would affect the BACP's compliance with the Standards, provided these recommended actions are effectively implemented and regularly reviewed.