Accredited Registers Notification of Change

The British Psychoanalytic Council

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 <u>Standards for Accredited Registers</u>, promoting effective operation, good practice, and public protection.

Accredited Registers are <u>subject to annual checks</u> to confirm they continue to meet the Standards. However, registers must notify the PSA of significant changes that could affect their compliance through the <u>Notification of Change (NOC)</u> 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) 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 BPC's adoption of the SCoPEd framework was complete, we have not reviewed these developments as part of this report.

Notification of Change

The British Psychoanalytic Council (BPC) represents psychoanalytic and psychodynamic therapists in the UK. BPC practitioners work through two related approaches:

- Psychoanalytic therapy: intensive exploration of unconscious factors through frequent sessions
- Psychodynamic therapy: similar principles applied in less frequent, potentially briefer treatments

Both approaches are recognised forms of talking therapy in NHS services, with NICE guidelines recommending psychodynamic approaches for certain conditions.

The BPC did not submit a formal Notification of Change form for their adoption of SCoPEd. In their 2024 Annual Check submission, they stated:

"As it currently stands, the SCoPEd framework does not impose any additional requirements compared to BPC's existing training criteria and requirements, and therefore we do not consider this a significant change."

The BPC considered that all existing and new registrants would be aligned with 'Column C' of the framework:

The BPC has stated on its website (https://www.bpc.org.uk/) that:

- "Nothing will change for our Registrants. They can confidently assume they meet column C competencies"
- No registrant will be disadvantaged by the adoption of the framework
- All BPC accredited courses will explicitly match column C competencies
- Future work will focus on equivalence provisions, with the BPC supporting Member Institutions and Training Organisations through any necessary adjustments

The BPC views the adoption of SCoPEd as an alignment with existing standards rather than a significant change to their registration processes.

The Outcome

We have assessed the BPC's adoption of the SCoPEd framework and concluded that it continues to meet all Standards for Accredited Registers.

The BPC's situation differs from other partner registers in that all BPC registrants already meet Column C competencies under the framework.

While we acknowledge that the SCoPEd framework has generated considerable debate, many of the concerns raised by practitioners, such as transitioning between columns and perceived changes to status, do not directly affect BPC registrants.

The BPC has committed to collaborate with other partner registers on the continued development and implementation of the framework, including working on equivalence provisions and supporting Member Institutions through any necessary adjustments.

We issued the BPC the following Recommendations:

- 1. The BPC should demonstrate how its accredited Member Institutes' trainings and equivalence processes align with the SCoPEd framework.
- 2. The BPC should make clear how its registrants align with Column C of the SCoPEd framework, and clarify that practitioners listed only in its Kitemark directory are non-registrants who may not have been assessed against SCoPEd competencies.
- 3. The BPC 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.

The Register

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

Date first Accredited	The British Psychoanalytic Council (BPC) was first accredited in November 2014.	
Type of Organisation	The BPC is a registered charity and company limited by guarantee in England and Wales [company number 05034324] and a registered charity [number 1185487]. The British Psychoanalytic Council (BPC) is the UK's leading professional association and accredited public register for psychoanalytic psychotherapy. The BPC is a voluntary accredited register; registering psychoanalytic and psychodynamic psychotherapists.	
Overview of Governance	The BPC is governed by its Board and supported and advised by the Chief Executive to provide the strategic direction of the organisation and ensure it is well governed. The Board is required to be made up of at least eight but no more than twelve Trustees, which consists of the Chair, the Vice-Chair, the Honorary Treasurer, chairs of any regulatory policy committees, at least two Lay Trustees and up to a maximum of four additional Trustees.	
	The details of above can be found here.	
Overview of the aims of the register	"The BPC is the leading professional association for psychoanalytic and psychodynamic psychotherapy professions in the UK. The BPC also sets the standards for their Member Institutions (MIs) who are training organisations and professional associations in their own right. The BPC accredits the training of their MIs, ensuring that they meet their exacting standards. Individuals who qualify from MI trainings are then eligible to become BPC Registrants and appear on the public register.	
	As well as their regulatory role, the BPC also advances the knowledge and understanding of the theory and practice of psychoanalysis and psychoanalytically informed therapies in a range of policy making and opinion forming areas in the UK.	
	More can be found <u>here</u>	

Register Website	British Psychoanalytic Council (bpc.org.uk)		
UK countries in which Register operates	All four countries in the United Kingdom: England, Northern Ireland, Scotland and Wales		
Role(s) covered	 Analytical Psychologist Child Psychoanalyst Child Psychotherapist Child and Adolescent Psychodynamic Counsellor Child and Family Psychodynamic Psychotherapist Couple Psychoanalytic Psychotherapist Couple Psychodynamic Psychotherapist Forensic Psychodynamic Psychotherapist Jungian Analyst Psychotherapist Jungian Child Analyst Jungian Psychotherapist 	 Medical Psychodynamic Psychotherapist Parent Infant Psychodynamic Psychodynamic Psychodynamic Psychodynamic Psychoanalyst Psychoanalytic Psychodynamic Counsellor Psychodynamic Corganisation Counsellor Psychodynamic Organisation Therapist Psychodynamic Organisation Therapist Psychodynamic Organisation Therapist 	
Number of registrants	2053 (as of 1 January 2025)		
Main practice settings	NHS, Private Clinics, Schools, Local authority service (such as social care), Voluntary Sector, Armed Forces, Church, Occupational Health Services and Emergency Services.		
About the patients and service users	People and children of all backgrounds experiencing mental health issues including anxiety, depression and mood changes. A growing body of evidence suggests that psychoanalytic psychotherapy is effective for many common mental disorders, including depressive disorders, anxiety disorders, eating disorders, post-traumatic stress disorder and substance-related disorder.		

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 BPC's adoption of the SCoPEd framework affected its ability to meet this Standard, focusing on how the framework clarifies qualifications and competencies for registrants.

1a) Eligibility of the Register under our legislation

1.3 The BPC's register remains a voluntary register under the Health and Social Care Act 2002, as psychoanalytic and psychodynamic therapists are not subject to statutory regulation. The BPC's adoption of the SCoPEd framework does not change this status.

1b) Public Interest Considerations

- 1.4 We considered whether the BPC'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: Registrants' activities will continue to provide the same benefits under the SCoPEd framework. The framework clarifies practitioner competencies across different levels, making it easier for clients to understand what to expect. This enhanced transparency aims to help clients make more informed choices about their therapy and could potentially strengthen public confidence in the profession.
- 1.6 Some stakeholders have expressed concerns that the SCoPEd framework might affect the availability of certain therapeutic approaches, particularly person-centred therapy and similar modalities in NHS settings. While we do not make judgments about the relative merits of different therapeutic approaches, we recognise these changes could affect how various therapy services are accessed.
- 1.7 The SCoPEd framework was revised in January 2022 to address these concerns by placing greater emphasis on the therapeutic relationship and practitioner qualities. It ensures that key elements like empathy, warmth, and rapport are recognised as essential competencies across all levels. The framework uses more inclusive language to better represent diverse therapeutic approaches and provides clear pathways for practitioners to

- progress between columns through professional development and experience, not just academic qualifications. Those seeking to join the BPC register may be able to demonstrate competencies gained through experience under SCoPEd by applying via equivalence assessment through one of its Member Institutions.
- 1.8 Mitigation of Risks: We have not identified any new practice risks from the adoption of the SCoPEd framework. However, feedback has highlighted potential confusion regarding BPC practitioner titles in relation to the framework's structure. While all BPC registrants meet Column C competencies, some use titles such as "Psychodynamic Counsellor" which might be associated with Columns A or B in other registers.
- 1.9 To address this potential confusion, we have recommended under Standard Three that the BPC should clearly communicate how all its registrants align with Column C of the SCoPEd framework, regardless of their specific professional titles. This clearer communication would help the public better understand the competency level of BPC practitioners. The BPC has noted on its website that the SCoPEd partnership has been working to determine whether specific titles should be associated with particular columns of the framework.
- 1.10 The SCoPEd partnership has established collaborative governance structures to ensure consistent application of competencies across all participating organisations. This aims to reduce conflicting interpretations of the framework. Partner registers, including the BPC, publish detailed registration and accreditation criteria on their websites, explaining the qualifications and competencies associated with different roles. These measures are intended to support public understanding of practitioners' competency levels, despite the variety of professional titles in use.
- 1.11 Avoiding Misleading Claims: No new risks of misrepresentation have been identified. The BPC registers practitioners at Column C only, while maintaining focus on its own standards and requirements in its public-facing materials. These materials align with the common standards outlined in the SCoPEd framework, supporting consistency across partner registers.
- 1.12 The BPC's updated Standards of Conduct, Practice and Ethics (November 2024, live from April 2025) explicitly require registrants to not accept work beyond their competence and to consult with supervisors if ongoing work may exceed that competence. The BPC has published detailed registration criteria on its website, promoting transparency and mitigating potential risks of misrepresentation.
- 1.13 We concluded that the BPC continues to meet this Standard following its adoption of the SCoPEd framework. While the BPC has indicated minimal changes for its registrants and operations, we will continue to monitor

registrants' public-facing materials to ensure consistency with the framework throughout the transition period.

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 The BPC maintains a single registration category corresponding to Column C competencies. Registrants qualify either through BPC-accredited MI training or by demonstrating equivalence through one of those bodies. The BPC's registration and management processes remaining unchanged following adoption of the framework.
- 2.3 The public register continues to provide information for all practitioners including professional title, contact details, relevant notes regarding availability, location, and any restrictions on practice.
- 2.4 We noted that while the BPC states all its registrants meet Column C competencies, there is no reference to SCoPEd within its equivalence guidance, and it is unclear how the Member Institutions have been assured as assessing equivalence against the SCoPEd competencies. To ensure transparency, consistency of standards across registers, and public protection, we issued the following **Recommendation**:
 - The BPC should demonstrate how its accredited Member Institutes' trainings and equivalence processes align with the SCoPEd framework.
- 2.5 The BPC also maintains a separate directory of 'Kite Marked Therapists' who have graduated from specific trainings such as in Dynamic Interpersonal Therapy (DIT). The directory states that listed practitioners who are not BPC registrants are not subject to the BPC's complaints procedure. To address potential confusion about competency levels, we issued the following Recommendation:
 - The BPC should make clear how its registrants align with Column C of the SCoPEd framework, and clarify that practitioners listed only in its Kitemark directory are non-registrants who may not have been assessed against SCoPEd competencies.
- 2.6 We concluded that the BPC 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 BPC 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 competencies across three levels (Columns A, B, and C) based on training, experience, and scope of practice. The BPC requires all its registrants to meet Column C competencies as a minimum requirement for registration, reflecting their established training and competency standards.
- 3.4 We reviewed the following evidence for this Standard:
 - BPC's practice and theory requirements
 - Information about BPC Member Institutions
 - The BPC Ethical Framework
 - Standards of Conduct, Practice and Ethics (effective 1 April 2025)
- 3.5 **Standard 3a: Competence:** The BPC has aligned its standards with SCoPEd by mapping registrants' training, experience, and demonstrated competencies to Column C. These competencies are supported by the BPC's existing requirements for continuing professional development, supervision, and safeguarding practices.
- 3.6 **Standard 3b: Professional Behaviours:** While SCoPEd does not directly influence the BPC's ethical standards, it reinforces professional responsibility. The BPC's 2011 Code of Ethics will be replaced by the <u>Standards of Conduct</u>, <u>Practice and Ethics</u> from April 2025, which requires registrants to "Work within your knowledge, skill, and professional competence."
- 3.7 **Standard 3c: Business Practices:** The framework does not impact business practices such as data confidentiality, complaint handling, or indemnity insurance. These requirements continue to be managed under the BPC's established processes.
- 3.8 We concluded that the BPC continues to meet this Standard following its adoption of the SCoPEd framework. We will continue to monitor the BPC's communication about how its registration standards align with the framework, particularly regarding equivalence pathways and its MI assessment processes.

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 Adoption of the SCoPEd framework aligns the BPC's education and training standards with nationally recognised benchmarks, including the National

- Occupational Standards (NOS) Framework and QAA Subject Benchmarks for Counselling and Psychotherapy.
- 4.3 The BPC registers practitioners who have successfully completed training or have been assessed for equivalence through a BPC-accredited Member Institution. The BPC's training requirements align with Column C of the SCoPEd framework.
- 4.4 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."
- 4.5 We concluded that the BPC 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 how its MIs' accredited training and equivalence processes align with the framework could further strengthen transparency around training pathways.

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 BPC handles complaints about registrants.
- 5.3 We checked the BPC's complaints handling processes, including their public-facing guidance on <u>How to raise concerns about a Registrant British</u> Psychoanalytic Council.
- 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 BPC's decisions about competency matters.
- 5.5 We concluded that the BPC 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 the BPC'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 BPC continues to meet this Standard following its adoption of the SCoPEd framework. While the BPC'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). The BPC requires all registrants to meet Column C competencies.

- 7.3 The BPC's adoption of SCoPEd aligns with its existing risk management approach as all registrants must meet Column C competencies. This provides:
 - Clear definition of advanced competencies required for registration
 - Consistent standards for assessing qualifications and experience
 - A framework for identifying if practitioners are working within their scope of practice
- 7.4 The framework could assist in providing transparency about BPC registrant capabilities. Public-facing information that all BPC registrants meet Column C competencies may help service users and employers understand the scope of practice.
- 7.5 BPC registrants must continue to:
 - Operate within their scope of practice
 - Recognise their professional limitations
 - Manage referrals appropriately when cases exceed their competence
- 7.6 The framework provides additional context around these ethical responsibilities through detailed competency descriptions.
- 7.7 The recommendations made under Standards 2 and 3 would further support risk management by providing greater transparency about how the BPC's registrants meet Column C competencies and how its accredited Member Institutes align with the framework.
- 7.8 We concluded that the BPC continues to meet this Standard following its adoption of the SCoPEd framework. The framework's defined competencies could help identify and manage risks related to scope of 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. Its uses engagement with relevant stakeholders to inform and enhance public protection.
- We considered whether the BPC 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 We reviewed the BPC's communications and found that it has taken steps to inform its stakeholders about SCoPEd implementation through various measures. These include:
 - Publishing clear statements that registrants automatically meet Column C competencies and will not be disadvantaged by the framework's adoption
 - Participating in joint partner events including the June 2022 Q&A session which drew over 1000 bookings
 - Establishing dedicated web pages providing information about SCoPEd implementation
 - Creating targeted communications for different stakeholder groups including registrants, Member Institutions, and training organisations
 - Engaging with the wider SCoPEd partnership's communications strategy through the Communications Group structure
- 8.5 The BPC published on its website that:
 - Day-to-day operations will not change for current registrants
 - Member Institutions' accredited courses already match Column C competencies
 - Some future work will be needed on equivalence mechanisms
 - The framework provides clarity about registrant competencies for patients
- 8.6 As part of the SCoPEd partnership's revised governance structure, the BPC participates in the Communications Group which develops partnership-wide communications.
- 8.7 We issued the following **Recommendation** encouraging the BPC to continue to develop its communication of the framework:
 - The BPC 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.
- 8.8 We found that the SCoPEd framework does not affect BPC's compliance with this Standard. We will continue to monitor the BPC's communications and engagement strategies to ensure that registrants, service users, and other stakeholders receive clear, accessible information about 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 BPC has incorporated Equality, Diversity and Inclusion (EDI) principles in its adoption of the SCoPEd framework.
- 9.3 The BPC has collaborated within the SCoPEd partnership on training accessibility, stakeholder engagement, and data collection initiatives, as outlined in the SCoPEd Independent Impact Assessment.
- 9.4 We received concerns about opportunities for progression between SCoPEd columns, which should not affect BPC registrants (as the register includes only Column C practitioners).
- 9.5 The SCoPEd impact assessment suggested that the high costs of psychoanalytic training and development may limit access for underrepresented groups. The BPC acknowledged that social class and disposable income are significant factors influencing access to both registration and treatment. Mitigating actions for these included plans for lowfee clinics and other initiatives to make therapy more accessible.
- 9.6 We concluded that the BPC continues to meet this Standard following its adoption of the SCoPEd framework. However, challenges remain regarding accessibility of psychoanalytic training and treatment. We will monitor the actions taken by the BPC to address these in future assessments.

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 BPC's adoption of the SCoPEd framework. Our 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 We considered the points raised in the SYE responses, and other sources such as online forums, that related to the BPC as both an individual register and as part of the SCoPEd partnership.

Key Themes Identified

1. Positive Perspectives

10.4 We received positive comments from people who believed that the adoption of SCoPEd could raise standards and support informed decision making by clients:

"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."

"Psychotherapists with the same training being treated differently by the registers... SCoPEd sets out to standardise competencies."

2. Challenges relevant to the BPC

- 10.5 Barriers to Entry and Training Costs: Concerns were raised about the affordability of psychoanalytic training, which disproportionately affects those from disadvantaged backgrounds. Concerns about financial barriers are consistent across partner registers but are particularly significant for the BPC due to the cost and length of training. If the BPC's Member Institutions' equivalency pathways formally considered experience and prior learning alongside academic qualifications, this could potentially help address these barriers to entry.
- 10.6 Transparency in Governance and Decision-Making Respondents raised concerns about a lack of transparency in decisions about SCoPEd's development and implementation. While this issue applies to all partner registers, feedback emphasised the importance of continued updates and open communication channels. The BPC has maintained information about SCoPEd on its website (https://www.bpc.org.uk/training/scoped/). Our recommendations to the BPC around demonstrating how its Member Institutes' trainings align with the framework, clarifying how registrants meet Column C competencies, and working with partners to provide clear summaries for different stakeholders, all aim to further strengthen transparency in implementation.
- 10.7 **EDI Challenges** Concerns that the registrant base remains predominantly "white, heterosexual, and over 60," suggested systemic barriers to diversity. The BPC has taken steps to address these concerns as in Standard 9.
- 10.8 Competency Alignment There were calls for greater clarity on how Column C competencies align with training pathways and equivalency assessments. Ensuring transparent and accessible processes will strengthen public and practitioner confidence in BPC's registration standards.

3. Broader concerns

- 10.9 Inconsistencies Across Registers: Concerns were raised about assuring consistency in how SCoPEd competencies are applied across different partner registers. Governance structures within the partnership must work to identify and address potential gaps.
- 10.10 Practitioner Well-Being: Feedback expressed anxiety about the impact on practice highlighting the need for clear communication and support from all partners, including the BPC.
- 10.11 The SYE highlighted challenges for the BPC to address, including barriers to training, EDI issues, and the need to assure competencies are transparently aligned with partner registers. Broader concerns, such as practitioner well-being should also be addressed within the wider role of the partnership.

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 register¹. In line with this, we assessed the likely impacts of the BPC'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. Unlike some partner registers, the BPC's situation is distinctive as all its registrants align with Column C, reflecting the advanced level of training and practice required for psychoanalytic practitioners.
- 11.3 The framework promotes equality, diversity, and inclusion (EDI) by requiring practitioners to demonstrate competencies that reflect and respect diverse backgrounds and needs. These include:
 - Understanding and applying the Equality Act and relevant legislation
 - Incorporating equality awareness and diversity considerations in ethical decision-making
 - Reflecting on one's own identity, culture, and values to work in a nondiscriminatory manner
 - At the Column C level, integrating relevant theory and research on diversity and equality into clinical practice

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¹ Accredited Registers Impact Assessment Guidance Sheet

- 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 considerations specific to the BPC's adoption of the framework:
 - While the BPC's registrants all align with Column C, clarity around this
 positioning is important for public understanding
 - Ongoing discussions about professional titles and terminology may affect how psychoanalytic practitioners are perceived
 - Consistent application of standards across partner registers remains important, even when the BPC's registrants occupy only one column
- 11.6 The BPC's participation in the SCoPEd partnership contributes to profession-wide consistency and transparency. This collaborative approach supports public confidence by establishing clear standards across different therapeutic modalities.
- 11.7 We concluded that adopting the SCoPEd framework presents no unaddressed negative impacts that would affect the BPC's compliance with the Standards. However, we emphasise the importance of continued monitoring, particularly regarding:
 - Clear communication to the public about what Column C registration signifies
 - Ongoing collaboration with partner registers to ensure consistency in standards
 - Regular collection and analysis of data to evaluate the framework's effectiveness and impact on diversity and inclusion
- 11.8 These measures will help ensure the framework delivers its intended benefits for registrants, employers, and service users, while supporting the BPC's commitment to maintaining high professional standards.