Accredited Registers Notification of Change

The Human Givens Institute

April 2025



Contents

The Notification of Change Process	
The SCoPEd framework	.4
Notification of Change	.5
The Outcome	
The Register	.7
Assessment against the Standards	.9

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 HGI's adoption of the SCoPEd framework was complete, we have not reviewed these developments as part of this report.

Notification of Change

The Human Givens Institute (HGI) has adopted the SCoPEd framework as part of its aim to "provide reassurance that counsellors and psychotherapists have received appropriate training and will help identify those with increased experience." The HGI has aligned its registration categories and training pathways with SCoPEd's three columns:

- Registered Member of the HGI (MHGI) [Column A]:
 A qualified Human Givens practitioner who has successfully passed all three
 - parts of the Human Givens Diploma and registered with the HGI. This category remains equivalent to the existing MHGI level of membership.
- Accredited Member of the HGI (MHGI Accred) [Column B]:
 "A more experienced Human Givens practitioner who can demonstrate the required hours of training and therapy, and evidence of safe, effective and ethical practice."
- Senior Accredited Member of the HGI (MHGI Snr Accred) [Column C]: "A highly experienced Human Givens therapist capable of taking an active role within the professional community, who can demonstrate the required hours of training and therapy and safe, effective and ethical practice."

The HGI also maintains other membership categories, including Trainee Member (not on the Accredited Register) and Fellow of the HGI (FHGI), awarded to registered members who have demonstrated commitment to advancing standards and best practice.

To support its registrants during the implementation of the framework, the HGI has:

- Provided information about the changes
- Briefed supervisors to help them support their supervisees
- Offered online webinars and Q&A sessions
- Developed guidance documents and application paperwork
- Created accessible pathways for demonstrating competencies that recognise prior learning and experience

The HGI has implemented these changes as part of the SCoPEd partnership's aim to align membership categories across all partner registers by early 2026.

The Outcome

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

The HGI's implementation of the framework introduces a more structured approach to recognising practitioners' competencies at different levels through the creation of new accreditation categories (Accredited and Senior Accredited membership). This change does not involve the reclassification of existing members, as the HGI previously had only one level of registered membership.

While we acknowledge that the SCoPEd framework has generated considerable discussion across the profession, the HGI 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 HGI 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.

We issued the HGI the following Recommendations:

- The HGI should communicate category of registration (Registered, Accredited, Senior Accredited) within register entries and directory profiles.
- 2. The HGI should make its Accreditation and Senior Accreditation Guidelines available on its public webpages to increase transparency about progression pathways
- 3. The HGI 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 HGI and its register.

Date first Accredited	13 April 2016
Type of Organisation	The HGI is a Private Limited Company (Company Number 4331916) governed by its Articles and Memorandum of Association.
Overview of Governance	The Human Givens Institute (HGI) is a global organisation 'run as a private limited company with the publicly stated aim that any profits which might accrue will be used solely to further its educational and professional activities and to spread knowledge of the beneficial implications of the human givens approach as widely as possible'.
	HGI has a Board, comprised of the directors of the HGI. Also has four specialist committees: Registration and Professional Standards Committee (RPSC), External Oversight Committee for Human Givens Therapy (EOC), Finance and Audit Committee and the Communications and Marketing Committee.
	'The HGI also works closely with the Human Givens Integrity Group, which leads on evaluation, efficacy, and research, and has six members, all volunteers.
Overview of the aims of the register	The HGI is the professional and regulation body for Human Givens therapists. It also offers a general membership level for people interested in the human givens approach.
	As set out on the HGI's Aims and objectives webpage:
	 to raise general awareness of the givens of human nature – which clarifies what we need in order to live mentally healthy and fulfilled lives and provides us with the framework for improving all forms of human endeavour and interaction.
	 to raise awareness of what constitutes effective therapy, and why the human givens approach belongs to this category.
	 to improve access to human givens therapy, including via GPs and the NHS
	 to extend the use of the human givens approach to other fields, such as education, business and diplomacy
	 to improve the way children are educated. to improve services to mentally and emotionally disturbed people

	 to make community life more humane and tolerant to show why human life is intrinsically meaningful.
Register Website	https://www.hgi.org.uk/
UK countries in which Register operates	England, Northern Ireland, Scotland, Wales 'The HGI's registrants are predominantly based in the UK, but membership also extends overseas, including Ireland, Holland, France, Germany, USA, Australia and South Africa'
Role(s) covered	The HGI operates a register for 'fully qualified human givens (HG) therapists' working as psychotherapists and counsellors
Number of registrants	310 (1 January 2025)
Main practice settings	NHS, private clinics, schools, Local Authority services, charities.
About the patients and service users	Could be anyone seeking, or having referred to services, for mental health and wellbeing. Service users could be children or adults.

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 HGI 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 Human Givens therapists working as counsellors and psychotherapists. 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 HGI'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. The HGI and other partner registers have recognised concerns about "a perceived diminishment of counselling and humanistic perspectives" and "a perception of more generally privileging of expensive formal training over other training routes and experience."
- 1.6 To address these concerns, the SCoPEd partnership has taken several steps, including revising the framework to incorporate greater emphasis on therapeutic relationships and practitioner qualities, using more inclusive language, and providing clear pathways for progression between columns

- through professional development and experience. The HGI's expanded categories of registration reflect the advanced competencies of Columns B and C, with pathways that include recognition of prior learning and other accessible means of demonstrating competence.
- 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 has highlighted ongoing concerns regarding professional titles and competencies, particularly around the distinction between "counsellors" and "psychotherapists." These disputes could potentially affect public understanding if stakeholders perceive inconsistency 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 HGI's public-facing materials focus on its own registration categories while aligning with the common standards outlined in the SCoPEd framework, supporting consistency across partner registers. The HGI has published information about its registration criteria on its website, promoting transparency and mitigating potential risks of misrepresentation.
- 1.10 We concluded that the HGI 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 HGI 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 adoption of the SCoPEd framework means that the HGI's existing and newly introduced categories of registration reflect alignment with Columns A, B, and C. The HGI's initial registration processes remain unchanged, requiring

- completion of the Human Givens Diploma to Practitioner Level (Part 3) for eligibility to join the register at Column A level.
- 2.4 The HGI has developed new accreditation processes to assess applications for Column B (Accredited) and Column C (Senior Accredited) membership against the competencies defined in the framework.
- 2.5 The HGI public register continues to indicate key information for all practitioners, including registration number, name, location, practice status, Human Givens supervisor status, and any complaints. This information is also provided on individual directory profiles, which allow registrants to advertise their services and areas of expertise.
- 2.6 We noted that at the time of our assessment, register and profile entries did not display level of registration (Registered, Accredited, Senior Accredited). To ensure transparency for the public about practitioners' competency levels under the new framework, we made the following Recommendation:
 - The HGI should communicate category of registration within register entries and directory profiles.
- 2.7 Regarding cross-registration and equivalence, we noted that the HGI maintains its requirement for registrants to have completed the Human Givens Diploma. While practitioners may belong to other professional registers and hold related counselling and psychotherapy qualifications at SCoPEd Column A level, there is no direct equivalency route that would meet the HGI's minimum registration requirements.
- 2.8 The HGI does, however, consider relevant experience and qualifications when assessing applications for Accreditation or Senior Accreditation. Applicants are required to demonstrate how they meet relevant SCoPEd competencies through their qualifications, professional experience, and continuing professional development.
- 2.9 We noted that the HGI's guidelines for Accreditation and Senior Accreditation are designed to be accessible, allowing competencies to be demonstrated through various means beyond formal qualifications. To enhance transparency about these pathways, we made a further **Recommendation**:
 - The HGI should make its Accreditation and Senior Accreditation Guidelines available on its public webpages.
- 2.10 We concluded that the HGI continues to meet this Standard following its adoption of the SCoPEd framework, but have made recommendations 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 HGI 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 introduces a structured system aligning registrants' competencies with three defined categories (Columns A, B, and C). These categories establish distinct practice levels based on training, experience, and skillsets, enhancing transparency and providing a clear framework for professional progression.
- 3.4 The HGI has mapped its membership categories to the framework, ensuring that standards for competence align with the corresponding column requirements:
 - Registered Members (MHGI) align with Column A
 - Accredited Members (MHGI Accred) align with Column B
 - Senior Accredited Members (MHGI Snr Accred) align with Column C
- 3.5 This mapping establishes clear expectations for practice at each level and provides registrants with defined pathways for professional development.
- 3.6 The HGI Ethics and Conduct Policy remains the core professional conduct standard for registrants. While SCoPEd does not directly influence this policy, it reinforces professional responsibility by specifying competencies tied to practice levels. This helps ensure registrants operate within the limits of their qualifications and experience, as reflected in the requirement to "Work within the limits of their experience and training, remaining aware, in particular, of the limits of their knowledge about medical matters and referring on to an appropriate medical or other professional any client who presents with physical or severe psychological conditions they are not qualified to help with."
- 3.7 The framework does not impact business practices such as data confidentiality, complaint handling, or indemnity insurance. These requirements continue to be managed under the HGI's established processes.
- 3.8 We concluded that the HGI continues to meet this Standard following its adoption of the SCoPEd framework. The framework enhances clarity for practitioners, clients and commissioners, which could 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 roles 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 HGI's education and training standards with nationally recognised benchmarks, including the National Occupational Standards (NOS) Framework.
- 4.3 The HGI's training pathway begins with the Human Givens Diploma (comprising theoretical foundations, practical skills, and supervised practice), which is required for registration at Column A. For progression to Column B (Accredited) and Column C (Senior Accredited), practitioners must demonstrate additional training hours, supervised therapy experience, and specific competencies aligned with the framework. The HGI's application processes and assessment criteria for these levels were reviewed and approved by the SCoPEd Clinical Group.
- 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 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.
- 4.6 The HGI clearly communicates information about its training requirements and how these align with the SCoPEd framework on its website and through communications with registrants.
- 4.7 We concluded that the HGI 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 HGI handles complaints about registrants.
- 5.3 We checked the HGI's complaints handling processes, including their <u>public-facing guidance on raising concerns about registrants</u>.
- 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 HGI's decisions about competency matters.
- 5.5 We concluded that the HGI 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 HGI or its register.
- 6.3 The SCoPEd framework's governance structure has evolved over time, from the initial Steering Group and Expert Reference Group to a more developed structure announced in February 2024. The current governance includes 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.
- 6.4 The HGI provides information about these partnership structures on its website, keeping registrants informed about developments and future plans. The HGI has highlighted two key areas of ongoing work: the development of a minimum data set using protected characteristics as a guiding framework, and enhanced communications through a new partner website and stakeholder engagement group.
- 6.5 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 or apply the framework independently.
- 6.6 These concerns have been addressed through multiple rounds of consultation, revisions to the framework to better integrate diverse therapeutic

- philosophies, conducting an independent Impact Assessment, providing regular communications updates, and expanding the partnership from three to six organisations (including the HGI).
- 6.7 We concluded that the HGI continues to meet this Standard following its adoption of the SCoPEd framework. While the HGI'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 HGI 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 We noted our recommendation from Standard 2 that the HGI should provide clear category of registration (Registered, Accredited, Senior Accredited) in its register entries and directory profiles to assist informed decision-making by service users.
- 7.6 We concluded that the HGI continues to meet this Standard following its adoption of the SCoPEd framework. The framework's structure could assist the HGI to manage risks associated with counselling and psychotherapy.

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.
- We considered whether the HGI 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 HGI has provided information about its adoption of SCoPEd through dedicated pages on its website, which explain the framework and its implementation. The HGI has communicated with registrants at various stages of the process:
 - Initial proposals were shared with registrants in March 2023
 - Comprehensive information on the changes was provided in Autumn 2023
 - Supervisors were briefed at a training day in October 2023
 - Online webinars, written guidance, and application paperwork were made available
 - An additional Q&A session was scheduled for January 2024
- 8.5 The HGI has taken steps to ensure clear public-facing communication about the framework and what it means for Human Givens practitioners. This includes providing information about how the three columns of the framework relate to the HGI's membership categories.
- 8.6 The HGI has participated in the SCoPEd partnership's Communications Group, which helps coordinate consistent messaging across all partner registers.
- 8.7 We issued the following **Recommendation** encouraging the HGI to continue to develop its communication of the framework:
 - The HGI 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 concluded that the HGI continues to meet this Standard following its adoption of the SCoPEd framework. The HGI has engaged with registrants and other stakeholders to communicate the changes arising from its adoption of the SCoPEd 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 HGI 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 HGI has integrated Recognition of Prior Learning (RPL) into its accreditation processes, a step designed to address potential financial and procedural barriers to meeting accreditation requirements. The HGI's approach to assessing competencies for higher columns includes several accessibility features:
 - Applications can be completed using various formats (including bullet points and visual illustrations), acknowledging that accreditation "is not a test of academic writing"
 - Evidence requirements are flexible, accepting supervisor reports, anonymised records, and reflective notes
 - Training equivalence is recognised, including professional specialism training alongside formal qualifications
 - Flexibility in how practitioners demonstrate personal development and reflective capacity
 - Technological accessibility is addressed through competencies for delivering therapy in different environments
- 9.4 The HGI has begun collecting demographic data from registrants, which could help monitor whether the adoption of SCoPEd has differential impacts on various groups.
- 9.5 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.
- 9.6 Feedback from the Share Your Experience process identified 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 HGI is working to implement.
- 9.7 We concluded that the HGI continues to meet this Standard following its adoption of the SCoPEd framework. The register has demonstrated evidence of EDI commitment through its accessible accreditation processes 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 HGI'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.
- 10.2 Consultation Response Overview
- 10.3 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
- 10.4 While most responses addressed the SCoPEd framework broadly rather than the HGI specifically, they highlighted recurring concerns and opportunities for improvement.

Themes Identified

1. Positive Perspectives

- 10.5 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

10.6 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.
- 10.7 The HGI joined the partnership in 2021, which helped broaden representation of integrative and humanistic 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

- 10.8 Concerns were raised about potential barriers for practitioners from non-traditional training routes or lower socioeconomic backgrounds. As the HGI has introduced new categories of registration rather than reclassifying existing members, its registrants have not experienced "demotion" concerns raised by some practitioners from other registers.
- 10.9 The HGI'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

10.10 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

- 10.11 Some respondents reported stress and anxiety associated with the changes introduced through the framework's implementation. The HGI has provided training, resources, and support for members during the transition period.
- 10.12 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.
- 10.13 The HGI 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 HGI'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 HGI 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.
- 11.8 We concluded that adopting the SCoPEd framework does not present an unaddressed negative impact that would affect the HGI'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.