Accredited Registers Notification of Change

National Counselling and Psychotherapy Society (NCPS)

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 <u>Scope of Practice and Education (SCoPEd) framework</u>.

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 (<u>www.pcpb.org.uk</u>) 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 NCPS' adoption of the SCoPEd framework was complete, we have not reviewed these developments as part of this report.

Notification of Change

The National Counselling and Psychotherapy Society (NCPS) operates an Accredited Register for counsellors who have been trained to Ofqual Level 4 standards or above. The NCPS has aligned the standards required for entry to its register with the SCoPEd framework, stating:

"Our goal is for the profession of counselling and psychotherapy to be better understood, valued and trusted by clients, patients, employers, commissioners and society.

The intended outcome is to provide those seeking the services of counsellors and psychotherapists who have adopted the framework with clear information on core training, practice and competence requirements so that they may make informed choices."

The NCPS has mapped the SCoPEd framework to its three existing registration categories:

- Accredited Registrant (MNCPS Acc) COLUMN A The minimum entry level to the register, this category aligns with SCoPEd's foundational Column A competencies without requiring changes to its existing standards.
- Accredited Professional Registrant (PNCPS Acc) COLUMN B For experienced practitioners with additional training and professional development, this category aligns with Column B and requires registrants to demonstrate competencies through application materials and a viva assessment.
- Senior Accredited Registrant (SNCPS Acc) COLUMN C The highest level, now requiring a Level 7 qualification or equivalent, replacing the previous requirement of seven years' practice experience. Existing Senior Accredited members have until January 2026 to demonstrate meeting Column C competencies or be reclassified as Column B practitioners.

The NCPS also maintains two specialist sub-registers: Children and Young People's Therapist (CYPT) and Relationship Therapist (RT). These specialisms operate independently of the SCoPEd framework, though practitioners must hold one of the main registration categories above.

"Fellow" (FNCPS) status, previously a registration category recognising professional contributions to the profession and the Society, has been reclassified as a non-registrant membership class. Practising Fellows have been reclassified as SNCPS Acc and must meet the requirements of that category.

The NCPS's partner register, the National Hypnotherapy Society (HS), is not part of the SCoPEd framework and has not adopted it. The HS continues to operate independently of the SCoPEd competency structure while maintaining its shared governance system with the NCPS.

The Outcome

We have assessed the National Counselling and Psychotherapy Society's (NCPS) adoption of the SCoPEd framework and concluded that it continues to meet the Standards for Accredited Registers.

The NCPS' implementation of the framework introduces a more structured approach to recognising practitioners' competencies at different levels through alignment of its existing registration categories with the three columns of the SCoPEd framework. The NCPS has mapped its Accredited Registrant (MNCPS Acc) category to Column A, its Accredited Professional Registrant (PNCPS Acc) to Column B, and its Senior Accredited Registrant (SNCPS Acc) to Column C.

While we acknowledge that the SCoPEd framework has generated considerable discussion across the profession, the NCPS has implemented the framework with a focus on continuity for existing registrants. The Society has prioritised continuity for existing registrants, with MNCPS Acc and PNCPS Acc members automatically aligning with Columns A and B respectively. For Senior Accredited members, the NCPS has established a transition period until January 2026 for demonstrating Column C competencies.

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

Following our assessment, we issued the NCPS the following Recommendations:

- The NCPS should, as a matter of priority, provide clear information on timelines, assessment criteria, costs, and available support to assist current SNCPS Acc. registrants in meeting the updated requirements, particularly for those awaiting alternative routes based on experience and skills.
- 2. The NCPS should publish clear mechanisms for assessing and verifying that practitioners from other registers, whether SCoPEd partners or otherwise, meet its accreditation standards.
- 3. The NCPS should publish its updated accreditation pathways that will apply following the transition period, or set out its plans for implementing these at the earliest opportunity for the benefit of registrants and other stakeholders.
- 4. The NCPS 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 NCPS and its register.

Date first	21 May 2013
Accredited	
Type of	Private companies limited by guarantee without share capital.
Organisation	NCPS: 05861051
	HS: 03739912
Overview of	The National Counselling and Psychotherapy Society
Governance	(NCPS) operates an Accredited Register for counsellors and
	psychotherapists. The National Hypnotherapy Society
	operates an Accredited Register for hypnotherapists. They
	share a common governance system and are jointly
	accredited by the PSA. They register counsellors,
	psychotherapists and hypnotherapists.
	The NCPS and HS are led by a single <u>Council</u> which "acts as
	the central governing body for the Society and uses their
	overall view of activities to guide the present and future
	direction of the Society.' The Council includes its Chair, Chief
	Executive, Deputy Chair, Heads of Departments and four lay
	members.
	The NCPS and HS' Independent Assessor "reviews and
	reports to the Chair and Chief Executive of the Societies on
	matters of Society Audit and Governance."
Overview of the	NCPS:
aims of the	The NCPS' ultimate aims are to nurture and protect the
register	vocation of counselling and psychotherapy, support and
	guide their members, and provide a high level of public
	assurance to those in search of a therapist.
	HS: [not included within this assessment]
Register Website	NCPS Counselling Matters
	HS: [not included within this assessment]
UK countries in	England, Northern Ireland, Scotland and Wales
which Register	
-	
operates	
operates Role(s) covered	Counsellors, Psychotherapists
operates Role(s) covered Number of	Counsellors, Psychotherapists 11740 (1 January 2025)
operates Role(s) covered Number of registrants	11740 (1 January 2025)
operates Role(s) covered Number of registrants Main practice	
operates Role(s) covered Number of registrants Main practice settings	11740 (1 January 2025)Private practice – online and in person therapy rooms.
operates Role(s) covered Number of registrants Main practice settings About the	11740 (1 January 2025) Private practice – online and in person therapy rooms. NCPS:
operates Role(s) covered Number of registrants Main practice settings	11740 (1 January 2025)Private practice – online and in person therapy rooms.

structured, confidential setting. The foundation of effective
counselling is providing clients with a professional
therapeutic relationship based on non-judgmental respect
and offering empathic understanding. Counsellors may
employ several additional ways of working to further support
their clients' healing and development.

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 NCPS' 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.

1a) Eligibility of the Register under our legislation

1.3 The NCPS continues to operate as 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, potentially improving understanding among clients, employers, and other stakeholders about the competencies and scope of practice associated with these roles.

1b) Public Interest Considerations

- 1.4 We considered whether the NCPS' 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 anticipated to remain consistent under the SCoPEd framework. By clearly defining practitioner competencies across register categories, the framework may enhance public understanding and accessibility, supporting informed client decision-making and reinforcing trust in the profession.
- 1.6 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 SCoPEd partnership has addressed these concerns by revising the framework to incorporate greater emphasis on therapeutic relationships and practitioner qualities, ensuring that empathy, warmth, and rapport are recognised as foundational competencies across all columns.

- 1.7 The NCPS has restructured its registration categories to align with SCoPEd Columns A, B, and C:
 - Existing MNCPS Acc and PNCPS Acc registrants were found to align with Columns A and B without requiring individuals to provide further evidence of meeting SCoPEd competencies.
 - The SNCPS Acc category now requires a level 7 Ofqual qualification or equivalent, replacing the previous requirement of seven years' practice experience, to align with SCoPEd Column C standards.
 - Existing Senior registrants must demonstrate meeting Column C competencies by January 2026 or be reverted to the PNCPS Acc (Column B) category.
- 1.8 The NCPS has stated that practitioners without the required qualifications will be able to demonstrate equivalency against the level 7 competencies via assessment by NCPS subject experts on its Professional Standards Committee.
- 1.9 Mitigation of Risks: No new practice risks have been identified as arising from the adoption of the SCoPEd framework. However, feedback from registrants highlights ongoing concerns regarding professional titles and competencies, particularly around the distinction between "counsellors" and "psychotherapists." These disputes raise potential risks to public understanding if stakeholders perceive inconsistency in how roles and qualifications are represented.
- 1.10 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.
- 1.11 The NCPS uses titles that are variations of "Accredited Registrant" it does not affix a level of competence to the counselling and psychotherapy occupational titles.
- 1.12 **Claims and Representations:** No new risks of misrepresentation have been identified. The NCPS' 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. Registration and accreditation criteria, including equivalence routes for other SCoPEd partners, are published on the NCPS website, promoting transparency and mitigating potential risks of misrepresentation.
- 1.13 We concluded that the NCPS 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 NCPS 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 NCPS has aligned its three registration categories with the SCoPEd framework's columns:
 - Accredited Registrant (MNCPS Acc) Column A
 - Accredited Professional Registrant (PNCPS Acc) Column B
 - Senior Accredited Registrant (SNCPS Acc) Column C
- 2.4 The NCPS' public register and counsellor directory continue to indicate the level of registration for all practitioners, displaying name, membership number, membership type (register category), membership status, and practice location. This information is also provided on individual directory profiles, which allow registrants to advertise their services, qualifications, and areas of expertise.
- 2.5 For initial registration at Column A level, applicants must have completed an NCPS Accredited Course or an Ofqual Level 4+ diploma in counselling/psychotherapy with 100+ supervised placement hours, delivered over 2+ years part-time with minimum 300 Guided Learning Hours.
- 2.6 The NCPS has established clear requirements for advancement to its Accredited Professional (Column B) and Senior Accredited (Column C) categories. Applications for these higher grades require supervisor endorsement that the registrant meets the competencies of the desired category.
- 2.7 For Senior Accreditation (Column C), the NCPS currently requires a Level 7 (or equivalent) counselling/psychotherapy qualification. The NCPS has stated that it will support applicants without these qualifications "in evidencing other experience and skills acquired through CPD and clinical experience alongside their training," to be assessed by subject experts on its Professional Standards Committee.
- 2.8 This "Complex Route" assessment process allows practitioners with nonstandard qualifications but substantial experience to demonstrate equivalence

to Level 7 competencies, though at the time of our assessment, specific details about this process were not yet published. Current Senior Accredited members have until January 2026 to demonstrate meeting Column C competencies or be reverted to Column B status, with the NCPS indicating that support will be available during this transition.

- 2.9 The NCPS also offers Equivalent Grades and Memberships to practitioners already belonging to other Accredited Registers, though this does not automatically confer an equal level of SCoPEd registration.
- 2.10 We identified some areas where additional clarity could benefit registrants and strengthen the NCPS' registration processes, and issued the following Recommendations:
 - The NCPS should, as a matter of priority, provide clear information on timelines, assessment criteria, costs, and actual available support to assist current SNCPS Acc. registrants in meeting the updated requirements, particularly for those awaiting alternative routes based on experience and skills.
 - The NCPS should publish clear mechanisms for assessing and verifying that practitioners from other registers, whether SCoPEd partners or otherwise, meet its accreditation standards.
 - The NCPS should publish its updated accreditation pathways that will apply following the transition period, or set out its plans for implementing these at the earliest opportunity for the benefit of registrants and other stakeholders.
- 2.11 We concluded that the NCPS 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 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.
- 3.3 The NCPS has aligned its standards of competence with the SCoPEd framework by mapping registrants to one of three defined columns based on their training, experience, and demonstrated competencies:
 - MNCPS Acc (Accredited Registrant) maps to Column A

- PNCPS Acc (Accredited Professional Registrant) maps to Column B
- SNCPS Acc (Senior Accredited Registrant) maps to Column C
- 3.4 The NCPS has assured that its existing MNCPS Acc and PNCPS Acc registrants equate to SCoPEd levels A and B without requiring further evidence. Current and future practitioners wishing to achieve or maintain their Column C (SNCPS Acc) registration will need to provide evidence of suitable qualifications or be assessed as holding the required competencies.
- 3.5 The SCoPEd framework defines the competencies required for safe, effective, and ethical practice, providing detailed expectations for each stage of professional development. These competencies are further supported by the NCPS' existing requirements for continuing professional development, supervision, and safeguarding practices.
- 3.6 While SCoPEd does not directly influence the NCPS Code of Ethics, 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 ethical requirement that "All practitioners undertake to ... discuss with clients realistic outcomes and limitations of the service offered."
- 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 NCPS' Code of Ethics.
- 3.8 We concluded that the NCPS' adoption of the SCoPEd framework has not impacted its ability to meet Standard Three. The NCPS' standards for competence, professional behaviours, and business practices align with the SCoPEd framework, ensuring registrants meet structured competency requirements. The framework enhances clarity for practitioners, clients, and commissioners, reinforcing professional responsibilities and defined scopes of practice.

Standard 4: Education and training

- 4.1 This Standard ensures that the register sets clear and appropriate education standards for the role(s) it registers and ensures registrants can identify when referral to another health or social care professional may be necessary.
- 4.2 The adoption of the SCoPEd framework introduces structured categorisation of training and practice requirements across Columns A, B, and C. This aligns the NCPS' education and training standards with recognised national benchmarks, such as the National Occupational Standards (NOS), and establishes clear minimum academic levels, training hours, and practice standards as agreed upon by participating organisations.

- 4.3 The NCPS advised that it has made no changes to its minimum registration requirements for its Accredited Registrant category (MNCPS Acc), which already aligned with the requirements of SCoPEd Column A. These include:
 - An NCPS Accredited Course or an Ofqual Level 4 minimum (or equivalent) diploma in core or basic one-to-one counselling or psychotherapy
 - With an integral supervised placement of at least 100 hours within an organisation or agency setting
 - Courses must be over a minimum of 2 years part-time with a minimum of 300 Guided Learning Hours
 - Online-only and distance learning courses are not accepted
- 4.4 The NCPS has stated that all NCPS-accredited training courses providing eligibility for registration will be fully aligned with SCoPEd Column A competencies by 2028, with the NCPS supporting training providers during this transition. Training providers are required to submit mapping documents to demonstrate where SCoPEd competencies are covered in their materials.
- 4.5 For progression to higher levels of registration, the NCPS provides competency requirements for advancing to Column B and C grades. Applicants for Column C must hold level 7 or equivalent counselling or psychotherapy qualifications, though the NCPS states it is developing mechanisms to allow applicants to evidence other experience and skills alongside training.
- 4.6 The SCoPEd framework explicitly addresses the need for practitioners to recognise their professional limitations and manage referrals appropriately. This is reflected in the NCPS Standards of Training, which require "an ability to demonstrate personal qualities associated with supporting a strong therapeutic relationship including: showing appropriate levels of empathy, warmth, concern, confidence, and genuineness, matched to the client's or patient's need."
- 4.7 Concerns had been raised about the framework's potential impact on different therapeutic approaches, particularly regarding person-centred therapy and other relational and humanistic-based modalities. The framework has been revised to integrate core relational competencies across all columns, including empathy, therapeutic relationship qualities, and self-awareness.
- 4.8 We concluded that the NCPS continues to meet this Standard following its adoption of the SCoPEd framework. The competencies outlined within the framework are designed to ensure registrants are prepared to practise safely and effectively across diverse populations, while also promoting transparency regarding training standards and progression 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 the NCPS handles complaints about registrants.
- 5.3 We checked the NCPS' complaints handling processes, including their <u>public-facing guidance on raising concerns about registrants</u>. The organisation's established procedures remain in place and are unaffected by the adoption of the SCoPEd framework.
- 5.4 The framework's standardised competencies may provide useful reference points when investigating complaints related to scope of practice and professional competence. This could potentially increase consistency in how complaints are evaluated across similar cases, and help other registers understand NCPS' decisions about competency matters.
- 5.5 We concluded that the NCPS continues to meet this Standard following its adoption of the SCoPEd framework. The standardised competencies defined in the framework may strengthen the organisation's ability to assess and handle concerns related to registrants' scope of practice.

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 NCPS or its register.
- 6.3 The NCPS is governed by the Society Council which "acts as the central governing body for the Society and uses their overall view of activities to guide the present and future direction of the Society." It is reported to by its Professional Conduct, Professional Standards, and Diversity & Inclusivity Committees. The NCPS employs an Independent Assessor to "review and report to the Chair and Chief Executive of the Society on matters of Society Audit and Governance."
- 6.4 The NCPS' Professional Standards Committee plays a key role in SCoPEd implementation by reviewing training provider applications and assessing "complex applications" that require detailed assessment of non-standard qualifications or experience.

- 6.5 The SCoPEd framework's governance has evolved to support implementation, with the original Steering Group and Expert Reference Group being replaced in 2024 by four coordinating bodies: a CEO Board providing strategic leadership, a Delivery Group implementing agreed actions, a Clinical Group maintaining framework standards, and a Communications Group managing stakeholder engagement.
- 6.6 Feedback gathered during the Share Your Experience (SYE) process highlighted concerns about governance and engagement, including perceived lack of transparency in decision-making, questions about the representation of diverse therapeutic modalities, and concerns about how additional organisations might join the partnership.
- 6.7 These concerns have been addressed through multiple rounds of consultation, revisions to the framework to better integrate diverse therapeutic approaches, conducting an <u>independent Impact Assessment</u>, providing regular communications updates, and expanding the partnership from three to six organisations (including the NCPS).
- 6.8 We concluded that the NCPS continues to meet this Standard following its adoption of the SCoPEd framework. While the NCPS' 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 managed 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), 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 NCPS 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"

- The NCPS Code of Ethical Practice which requires: "All Practitioners undertake to: Provide a service to clients solely in areas in which they are trained and competent to do so"
- 7.4 The framework assists in mitigating risks to public protection by providing transparency about practitioners' capabilities. Public-facing information outlines the scope of practice for each column, helping service users make informed decisions when selecting practitioners.
- 7.5 The NCPS register highlights the "Member Status" of each registrant, for example "Senior Accredited", enabling service users to identify the level of practice competency.
- 7.6 We concluded that the NCPS continues to meet this Standard following its adoption of the SCoPEd framework. The framework provides a clear structure that could assist the NCPS to manage risks associated with scopes of practice within 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.
- 8.2 We considered whether the NCPS has communicated the development and implementation of the SCoPEd framework clearly to its stakeholders.
- 8.3 The NCPS has provided updates on the development and adoption of the SCoPEd framework through its news section, highlighting key milestones such as its initial concerns about the project and the registrant vote on adoption held on 1 September 2022. The NCPS has also advocated for actions like the independent impact assessment.
- 8.4 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 workforce needs. It recommended developing concise, jargon-free summaries tailored to different audiences to improve understanding.
- 8.5 At the time of our assessment, the NCPS' dedicated page for SCoPEd provided the framework and accessible version, but lacked contextual explanation or summary information that would help different stakeholders understand its implications. We noted that work on the website was underway, which may affect how SCoPEd information is presented.

- 8.6 The NCPS has updated its materials to explain how its registration and accreditation categories align with the SCoPEd framework, including that its basic registration criteria reflect Column A and how practitioner accreditation allows advancement to Columns B and C.
- 8.7 We concluded that the NCPS continues to meet this Standard following its adoption of the SCoPEd framework. However, in line with recommendations from the commissioned Impact Assessment, we issued the following Recommendation:
 - The NCPS 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.

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 NCPS has incorporated Equality, Diversity and Inclusion (EDI) principles in implementing the SCoPEd framework, including its approaches to registration and accreditation.
- 9.3 The NCPS has maintained its "Complex Route" for registration, allowing practitioners with non-standard qualifications and relevant experience to demonstrate SCoPEd competencies. This approach helps ensure that practitioners with extensive experience but without formal existing accreditation are not unfairly disadvantaged.
- 9.4 Applications via the Complex Route may involve online, live 'vivas' before the Professional Standards Committee to demonstrate competencies relevant to safe, ethically sound practice. This flexible approach benefits practitioners with both standard and non-standard qualifications.
- 9.5 The NCPS' Equal Opportunities policy outlines its approach to equal access to the register and the provision of treatment. The society is also a founding member of the Coalition for Inclusion and Anti-Oppressive Practice, which has developed a toolkit to ensure the counselling and psychotherapy profession is as open and welcoming as possible to all.
- 9.6 The NCPS has indicated it will collect demographic data from new registrants, which will help monitor the impact of SCoPEd implementation on different groups. This aligns with the SCoPEd framework, which incorporates EDI competencies across all columns, requiring registrants to understand and apply the Equality Act 2010, work in a non-discriminatory manner, and reflect on their own identity and cultural values in relation to professional practice.

- 9.7 Feedback from the SYE process identified concerns around perceived inequities in accreditation pathways, particularly for registrants with non-traditional qualifications or those impacted by financial and systemic barriers. The commissioned Impact Assessment recommended enhanced demographic data collection, continued development of EDI monitoring systems, and recognition of prior learning pathways to value professional experience alongside academic qualifications.
- 9.8 We concluded that the NCPS continues to meet this Standard following its adoption of the SCoPEd framework. The register has demonstrated evidence of commitment to EDI through its policies and its accessibility measures for practitioners seeking registration and accreditation. Collection of demographic data will allow the NCPS to monitor impacts and outcomes across different groups, though as noted in the Impact Assessment, this work requires continued development to assess the success of these measures.

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 NCPS' 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 most responses addressed the SCoPEd framework broadly rather than the NCPS specifically, they highlighted recurring concerns and opportunities for improvement.

Key Themes Identified

1. Positive Perspectives

10.4 Some respondents believed that the adoption of SCoPEd could raise standards and support informed decision making:

"The SCoPEd classifications are clear and transparent... Psychotherapists should be classified consistently across all registers to provide consistency and clarity to clients." "I think it's important to show the differences in counselling and psychotherapy training and practice, and I believe it will overall raise standards of training."

10.5 The NCPS has addressed such comments through expanded public-facing materials about registration categories and competency levels, and by maintaining accessible accreditation pathways to support registrant progression.

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 through multiple rounds of consultation, significant revisions based on feedback, and enhanced communication channels.
- 10.7 The NCPS joined the partnership in 2021, which helped broaden representation of therapeutic approaches in the framework's development. The January 2022 revision incorporated greater emphasis on therapeutic relationships and practitioner qualities in response to feedback. NCPS members voted on adoption in September 2022, with 54% of participating members supporting the framework.

3. Impact on Senior Accredited Status

- 10.8 Concerns about perceived demotion or removal of senior accredited status were particularly acute among older and experienced practitioners. The NCPS advised that its current Senior Accredited membership is based on a minimum practising period (7 years) rather than the Level 7 qualification now required under SCoPEd Column C. The NCPS has responded to these concerns by establishing a two-year transition period until January 2026, during which current Senior members can maintain their SNCPS (Acc) title and logo while preparing applications for the updated Senior membership.
- 10.9 The NCPS has committed to developing assessment pathways that allow practitioners to demonstrate Column C competencies through experience and CPD rather than formal qualifications alone, with applications to be evaluated by subject experts on the NCPS Professional Standards Committee. Those who do not meet or apply for the Column C Standards by the end of this period will be reclassified as Column B practitioners.

4. Elitism and Inequality

- 10.10 Concerns were raised about perceived barriers for practitioners from nontraditional training routes or lower socioeconomic backgrounds. The NCPS has taken steps to address these concerns through:
 - Maintaining existing status for Accredited Professional Registrants (PNCPS Acc) without further assessment

- Committing to support applicants for Senior Accreditation without Level 7 qualifications by assessing experience and skills acquired through CPD and clinical practice
- Beginning collection of registrant diversity data
- Allowing cross-registration from some SCoPEd partner registers at equivalent levels

5. Inconsistencies Across Registers

10.11 Feedback highlighted inconsistencies in how qualifications and experience are recognised across different partner registers. The SCoPEd partnership has established governance structures to promote consistency in standards application. The NCPS clearly states SCoPEd column equivalence in its registration and accreditation criteria.

6. Practitioner Well-being

- 10.12 Stress and anxiety associated with the SCoPEd framework changes were frequently reported, with respondents citing insufficient support. The NCPS has provided resources for members and maintains a dedicated SCoPEd page with partnership and NCPS-specific updates.
- 10.13 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.
- 10.14 The NCPS 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 NCPS' 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 At more advanced levels, EDI-related competencies are further developed, including the ability to reflect upon and explore identity, culture, values, and worldviews, and to integrate relevant theory and research in these areas into clinical practice.
- 11.5 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
- 11.6 The assessment also 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
- 11.7 The NCPS has amended its routes of registration and accreditation to ensure compliance with the SCoPEd framework. This includes transition routes and complex-application procedures that allow applicants with non-standard qualifications and experience to demonstrate meeting the required competencies.
- 11.8 The NCPS has addressed potential negative impacts through several measures:
 - Maintaining accessible entry requirements for initial registration
 - Offering Complex Route assessment for non-standard applications

- Providing support for existing Senior Accredited members during the transition period
- Beginning to collect demographic data to monitor impacts on different groups
- 11.9 The NCPS advised that its current Senior Accredited membership is based on a minimum practising period (7 years) rather than the Level 7 qualification now required under SCoPEd Column C. The NCPS has responded to these concerns by establishing a two-year transition period until January 2026, during which current Senior members can maintain their SNCPS (Acc) title and logo while preparing applications for the updated Senior membership. The NCPS has committed to developing assessment pathways that allow practitioners to demonstrate Column C competencies through experience and CPD rather than formal qualifications alone, with applications to be evaluated by subject experts on the NCPS Professional Standards Committee. Those who do not meet or apply for the Column C Standards by the end of this period will be reclassified as Column B practitioners.
- 11.10 The framework's emphasis on EDI within its competencies may positively impact both the profession and the public, fostering inclusivity and ethical practice. However, the success of this approach depends on ongoing data collection and monitoring to ensure that the framework truly advances EDI objectives.
- 11.11 Based on our assessment, we found no evidence that the adoption of the SCoPEd framework presents an unaddressed negative impact that would affect the NCPS'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.