Accredited Registers Notification of Change

United Kingdom Council for Psychotherapy (UKCP)

April 2025

professional
standards
authority

Contents

The Notification of Change Process

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

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

Our criteria for assessing NOCs considers:

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

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

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

How We Assess a Notification of Change

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

If it does not, we may:

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

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

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

The SCoPEd framework

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

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

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

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

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

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

Update on the SCoPEd Partnership

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

The PCPB notified us about their new website (www.pcpb.org.uk) 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 UKCP's adoption of the SCoPEd framework was complete, we have not reviewed these developments as part of this report.

Notification of Change

The United Kingdom Council for Psychotherapy (UKCP) registers both psychotherapists and psychotherapeutic counsellors, each meeting distinct training standards:

- "Psychotherapists complete a minimum of four years of postgraduate-level education, which includes in-depth theoretical, experiential, and clinical training across a range of psychotherapeutic approaches. Their training equips them to address complex mental health and emotional issues, often requiring advanced clinical expertise and research skills.

- Psychotherapeutic counsellors undertake comprehensive training, typically at graduate level or equivalent, with a strong emphasis on fostering an in-depth therapeutic relationship. Their training focuses on understanding clients' emotional and psychological challenges and working collaboratively to support change."

Both roles operate within UKCP's ethical framework and require supervised clinical practice, personal therapy, and ongoing professional development.

We noted in our Standard One assessment that the UKCP's psychotherapists and psychotherapeutic counsellors offer recognised forms of talking therapy in NHS services, for example Cognitive Behavioural Therapy (CBT) and psychodynamic psychotherapy for the management of depression in children and young people.

The UKCP was one of the three founding organisations in the SCoPEd initiative, alongside BACP and BPC. In their Notification of Change form for their adoption of SCoPEd, the UKCP advised that this represented:

"... no material change to our standards, accreditation or training requirements. Our registrants map directly onto the framework and so there is no change for them, other than their registration/qualifications being represented within the framework."

The UKCP published on its website that:

"For registrants working with adults, your training is recognised within columns B (for psychotherapeutic counsellors) and column C (for psychotherapists) of the SCoPEd framework.

For those of you in training, the mapping of existing standards and frameworks means that you can be assured that once qualified with UKCP accreditation you will be recognised as meeting the competences of columns B (for psychotherapeutic counsellors) and C (for psychotherapists) of the framework."

The UKCP also told us how its adoption of the framework would impact on its Member Organisations, responsible for training, accreditation of qualifications, and registration.

The Outcome

We have assessed the UKCP's adoption of the SCoPEd framework and concluded that this change does not impact their compliance with the Standards for Accredited Registers.

The UKCP's situation differs from some other partner registers in that its existing registration categories already aligned with the SCoPEd framework without requiring changes to its standards or processes. Its psychotherapeutic counsellors map to Column B, while its psychotherapists map to Column C.

While we acknowledge that the SCoPEd framework has generated considerable discussion across the profession, many of the concerns raised by practitioners do not directly affect UKCP registrants. The UKCP has committed to collaborate with other partner registers on the continued development and implementation of the framework.

We have issued Recommendations to enhance clarity and transparency about the framework.

We issued the UKCP the following **Recommendations**:

1. The UKCP should provide clear information about the relationship between its categories of registrants and the SCoPEd framework to assist the public in making informed decisions.

2. The UKCP should clearly distinguish between Psychotherapeutic Counsellors (Column B) and Psychotherapists (Column C) in its public resources.

3. The UKCP should clarify the use of professional and modality-specific titles in its directory to reflect registrants' qualifications and registration levels.

4. The UKCP should update guidance pages to support informed decision-making by the public when selecting a practitioner.

5. The UKCP should state how its accredited trainings, and equivalence assessments, align with the SCoPEd framework.

6. The UKCP should clearly define and publish pathways for progression from Column B to Column C and ensure that its Colleges and Organisational Members provide consistent, up-to-date information reflecting these pathways.

7. The UKCP should update its published Standards of Education and Training to explicitly reference the SCoPEd framework.

8. The UKCP 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 UKCP and its register.

Date first Accredited	10 September 2015
Type of Organisation	Registered charity (1058545) Registered Company (3258939)
Overview of Governance	"UKCP is governed by our Board of Trustees. The Board sets overall strategy and policy, defines organisational goals, and evaluates performance. The Board is made up of members elected by the UKCP membership as well as lay trustees, who are not psychological professionals. They are appointed by the Board to provide an independent view and a different perspective on the work and to bring additional skills and experience. To help the Board fulfil its role, there is an Executive Committee which oversees ongoing work. Responsible to members and the Charity Commission, the Board oversees the fulfilment of the charity's objectives. The Board meets four times a year. The Chair of UKCP and the Board of Trustees is elected. The Chair leads the Board which, together with the Chief Executive, sets the strategy for the organisation. The Chair and the Chief Executive together lead the organisation and represent UKCP to the public."
Overview of the aims of the register	'**Improving access** To make sure that high-quality psychotherapy and psychotherapeutic counselling in both private and public sectors is available to everyone, no matter who they are. **Engaging better** To improve the way we engage with our individual and organisational members and provide services and benefits which are valued by all. **Maintain standards of excellence** To protect the public by making sure everyone on our register meets our professional standards, at the same time making sure our register meets national accreditation requirements. To continue setting high standards in the way we govern and organise ourselves.

	Collaborating for success To develop existing external collaborations and actively seek new ones to achieve a more powerful voice to promote psychotherapy and psychotherapeutic counselling. **Research** To carry out appropriate research and use findings to promote psychotherapy and psychotherapeutic counselling and inform our members' training and development for the benefit of all.'
Register Website	https://www.psychotherapy.org.uk/
UK countries in which Register operates	England, Northern Ireland, Scotland, Wales
Role(s) covered	**Psychotherapists, Psychotherapeutic counsellors**
Number of registrants	9024 (1 January 2025)
Main practice settings	Private practice and NHS including clinical environments such as mental health units
About the patients and service users	Patients include individual adults but may also be couples, families and groups. Patients need not be in crisis or have a diagnosed mental illness to have psychotherapy.

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 UKCP continues to operate as a voluntary register for roles that are not subject to statutory regulation, aligning with the requirements under the legislation. The adoption of the SCoPEd framework does not change this status. The UKCP registers both psychotherapists and psychotherapeutic counsellors, each meeting distinct training standards. The UKCP told us that there was no "anticipated change to the operations of our Register as our standards and training map directly to the framework with no changes required."

1b) Public Interest Considerations

1.3   **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.

1.4   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 UKCP and wider partnership have responded to these concerns, clarifying that these approaches will still be available, either as "top-up" training to core SCoPEd qualification or through separate occupational routes outside of the framework's scope.

1.5   The January 2022 version of the framework incorporates greater emphasis on therapeutic relationships and practitioner qualities, uses more inclusive language to represent diverse approaches, and outlines opportunities for therapists to progress between columns through professional development and experiential learning.

1.6   **Mitigation of risks:** No new practice risks have been identified as arising from the adoption of the SCoPEd framework. However, feedback from

registrants highlights ongoing concerns regarding professional titles and competencies, particularly around the distinction between "counsellors" and "psychotherapists." These disputes raise potential risks to public understanding if stakeholders perceive inconsistency or bias in how roles and qualifications are represented.

1.7   The UKCP provided information about titles from the SCoPEd partner update, noting that the partnership has mapped membership levels to the columns to show the equivalency of membership categories. This gives clarity to therapists, the public and commissioners, with each organisation maintaining its own membership categories while the framework provides a general sense of core training.

1.8   **Claims and representations:** UKCP registrants must abide by the Code of Ethics which includes requirements to understand the limits of their competence and advertise their services accurately without exaggeration. The UKCP registers psychotherapeutic counsellors at 'Column B' and psychotherapists at 'Column C', but we considered that this description of competence levels is not adequately presented on the UKCP's public resources.

1.9   There is also a risk of confusion due to the use of professional titles associated with therapy types that are not clearly linked to the SCoPEd framework. Additionally, the UKCP's specific registration requirements do not highlight how each category meets the framework's requirements.

1.10   We concluded that the UKCP's adoption of the SCoPEd framework does not negatively impact its ability to meet Standard One. The UKCP's existing categories of registration align with the SCoPEd framework's competencies at Columns B and C without requiring changes to its standards.

1.11   However, we considered that the UKCP could more clearly demonstrate how its two register categories align with their respective framework columns to support transparency and reduce the risk of misrepresentation. We suggest the following Recommendation:

- The UKCP should provide clear information about the relationship between its categories of registrants and the SCoPEd framework to assist the public in making informed decisions.

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 UKCP did not anticipate changes to operation of its register following the adoption of SCoPEd, as its standards and training map to columns B and C competencies. Initial registration processes require registrants to have

demonstrated meeting Column B or C requirements but are otherwise unchanged.

2.3   The UKCP Public Register continues to indicate the level of registration for all practitioners, showing full name, membership number, Register category, Child and Adolescent Proficiency Marker, and Organisational Member. This information is also provided on individual "Find a Therapist" directory profiles. Suspended or removed registrants are not displayed on the register or directory, with their status reflected on the UKCP website's decisions and hearings page.

2.4   UKCP registrants will either be Column B or C. Although communicated primarily to registrants on their SCoPEd updates page, this is not set out on the register website which provides descriptions of its register categories. The register links to UKCP's guidance pages, but these resources do not clearly distinguish between the two register categories.

2.5   We identified a potential risk that individuals accessing the register and directory could be confused by the professional titles listed under 'types of therapies offered,' such as 'Family Therapist.' While Psychotherapeutic Counsellors (Column B) appear to list only the title 'Psychotherapeutic Counsellor' on their directory profiles, it is unclear whether only Psychotherapists (Column C) are permitted to use specific modality titles.

2.6   Any applicant to the UKCP register must apply through one of the UKCP's organisational members (or previously have been registered via one, if moving to direct membership) having "completed and graduated from a UKCP accredited course or have been accredited based on prior learning/experience by one of our organisational members".

2.7   We did not find clear references to the SCoPEd framework within the UKCP's registration information, standards of training, or on the websites of its Organisational Members. This lack of explicit integration may create uncertainty regarding the consistent application of SCoPEd competencies.

2.8   We concluded that the UKCP's existing registration processes remain in place, and the public register continues to clearly state identifying details, including each registrant's registration category and any disciplinary outcomes.

2.9   However, in the interests of transparency, consistency of standards across registers, and public protection, the UKCP could strengthen its approach by referencing the SCoPEd framework within its register information and outlining mechanisms for how it recognises and assesses qualifications from both SCoPEd partner registers and non-partner registers that wish to apply the SCoPEd framework.

2.10   We issued the following recommendations:

- The UKCP should clearly distinguish between Psychotherapeutic Counsellors (Column B) and Psychotherapists (Column C) in its public resources.

- The UKCP should clarify the use of professional and modality-specific titles in its directory to reflect registrants' qualifications and registration levels.

- The UKCP should update guidance pages to support informed decision-making by the public when selecting a practitioner.

- The UKCP should state how its accredited trainings, and equivalence assessments, align with 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 The SCoPEd framework aligns the UKCP's existing standards with Columns B and C of the competency structure. While SCoPEd establishes three practice levels (A, B, and C), the UKCP requires all registrants to meet Column B or C competencies as a minimum standard, reflecting their established training requirements.

3.3 The UKCP has aligned its standards of competence with the SCoPEd framework by mapping registrants' training, experience, and demonstrated competencies to Column B for Psychotherapeutic Counsellors and Column C for Psychotherapists.

3.4 SCoPEd defines competencies required for safe, effective, and ethical practice, providing detailed expectations for each stage of professional development. These competencies are further supported by the UKCP's existing requirements for continuing professional development, supervision, and safeguarding practices.

3.5 The UKCP's SCoPEd news page states: "There is no need for any changes to our individual membership grades based on the SCoPEd framework. Some partner organisations need to develop processes for transition between columns, but we already have this within our systems." However, the UKCP does not clearly indicate whether psychotherapeutic counsellors can advance to Column C through its own processes or via accreditation by an Organisational Member.

3.6 The UKCP Code of Ethics and Professional Practice (October 2019) requires registrants to "offer only the forms of therapy in which you have had adequate training or experience" and to "understand the limits of your competence and stay within them in all your professional activity, referring clients to another professional when appropriate."

3.7 The framework does not impact on business practices such as data confidentiality, complaint handling, or indemnity insurance. These requirements continue to be managed under the UKCP's established processes.

3.8 We concluded that the UKCP's adoption of the SCoPEd framework has not impacted its ability to meet Standard Three. The UKCP has aligned its standards of competence, professional behaviours, and business practices with the SCoPEd framework, ensuring registrants meet clear and structured competency requirements.

3.9 We issued the following **recommendation**:

- The UKCP should clearly define and publish pathways for progression from Column B to Column C and ensure that its Colleges and Organisational Members provide consistent, up-to-date information reflecting these pathways.

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 Adoption of the SCoPEd framework introduces categorisation of training and practice requirements across the three columns (A, B, and C). The framework aims to align UKCP's education and training standards with recognised national benchmarks, such as the National Occupational Standards (NOS), and reflects minimum academic levels, training hours, and practice standards agreed upon by participating organisations.

4.3 The framework intends to clarify the competencies required at different levels of practice and aims to promote alignment across professional bodies and educational institutions. The UKCP has mapped its grades of registration against the training standards and competences set out in the SCoPEd framework.

4.4 We reviewed the UKCP's training standards and noted:

- Psychotherapeutic Counsellors (Column B Alignment): UKCP's Psychotherapeutic Counselling Standards of Education and Training (2019) align with the competencies outlined in SCoPEd Column B, including graduate level or above training, a minimum of three years of training, at least 450 training contact hours, and a minimum of 100 supervised client hours prior to qualification.

- Psychotherapists (Column C Alignment): The UKCP Standards of Education and Training (2017) for psychotherapists reflect alignment with SCoPEd Column C competencies, including postgraduate

Master's level training, a minimum of four years of training, over 360 hours of academic teaching, and at least 450 supervised client hours during training.

4.5   The SCoPEd framework makes explicit statements regarding the need to refer, requiring 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."

4.6   We noted that the UKCP's published training standards (2017 and 2019) do not reference the SCoPEd framework. Addressing this in future editions, or amending the current documents, could provide greater clarity for registrants, the public, organisational members, and other stakeholders.

4.7   We concluded that the UKCP continues to meet this Standard following its adoption of the SCoPEd framework. The framework aligns with national benchmarks, its competencies are designed to prepare registrants to practise safely and effectively, and the UKCP's training criteria align with the framework's requirements.

4.8   We issued the following recommendation:

- The UKCP should update its published Standards of Education and Training to explicitly reference the SCoPEd framework.

Standard 5: Complaints and concerns about registrants

5.1   This Standard ensures that the organisation has comprehensive 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 UKCP handles complaints about registrants.

5.3   We checked the UKCP's complaints handling processes, including their public-facing guidance on raising concerns about registrants.

5.4   The SCoPEd framework adds standardised competencies that might help when assessing complaints about competence. This could make complaint handling more consistent and help other registers understand UKCP's decisions about competency matters.

5.5   We concluded that the UKCP 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 UKCP or its register.

6.3   The framework's governance structure has evolved to support implementation, with the original SCoPEd Oversight Committee and Technical 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.

6.4   The UKCP is governed by its Board of Trustees, supported by its committees, which includes the Education Training and Practice Committee (ETPC) and Membership Committee. The UKCP did not advise of any changes to its governance following the adoption of SCoPEd.

6.5   The UKCP's most recent update about SCoPEd, announcing its February 2023 adoption of the framework, highlighted that it and the other partners would "work so all partners' membership categories are fully aligned to the standards of the SCoPEd framework by early 2026" and establish "agreed mechanisms to enable movement of membership categories and SCoPEd columns, where appropriate and if members and registrants wish to."

6.6   The UKCP and partner registers have established update mechanisms including Q&A events, appointed Experts by Experience to provide service user perspectives, and are developing a minimum data set using protected characteristics as a guiding framework. A partner website and stakeholder engagement group are being developed to enhance transparency and communication.

6.7   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 representation of diverse therapeutic approaches in the Expert Reference Group, and concerns about potential conflicts of interest within the framework. The SCoPEd partnership has addressed these concerns through multiple rounds of consultation, framework revisions, an independent Impact Assessment, direct communication channels, and expansion of the partnership from three to six organisations.

6.8   We concluded that governance arrangements for implementing SCoPEd do not negatively impact the UKCP's ability to meet Standard 6. While maintaining its own governance structures, the UKCP's role as a founding member means it shares responsibility for framework development and implementation through a comprehensive risk management system that identifies impacts, assigns responsibilities, and addresses risks.

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 required for UKCP registrants, who must achieve Column B or C competencies to register. This alignment provides a structure that can help identify and manage risks associated with practitioners' scope of practice.

7.3   The UKCP's adoption of SCoPEd aligns with its existing risk management approach as all registrants must meet Column B or C competencies. This provides:

- Clear definition of advanced competencies required for registration
- Consistent standards for assessing qualifications and experience
- Framework for identifying if practitioners are working within their scope of practice

7.4   The framework assists in mitigating risks to public protection by providing transparency about UKCP registrant capabilities. However, we noted in previous standards that the UKCP's public-facing information could better outline that its two register categories meet either Column B or C competencies. This would help service users and employers make informed decisions when selecting practitioners.

7.5   UKCP 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 clarity around these ethical responsibilities through detailed competency descriptions.

7.7   We concluded that the UKCP's adoption of the SCoPEd framework has not impacted its ability to meet Standard Seven. As noted under Standard 5, the framework provides a structure that could assist the UKCP to manage competency-based risks.

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   The UKCP has communicated its adoption of the SCoPEd framework through its own channels and the partnership's Communications Group. The UKCP maintains a SCoPEd updates page on its website.

8.3   The SCoPEd Impact Assessment highlighted the need for clearer public-facing communication, with service users requesting "a 'plain English' single page that would summarise and tailor the content for the audience." This approach would assist employers and commissioners, clients and the public to have clarity on the competency level held by practitioners on each column.

8.4   The UKCP has published specific guidance for its registrants and Organisational Members on its website, explaining:

- There is no need for changes to individual membership grades based on the SCoPEd framework

- Registrants working with adults have their training recognised within columns B (for psychotherapeutic counsellors) and column C (for psychotherapists)

- Those in training will be recognised as meeting the competences of columns B and C once qualified with UKCP accreditation

- The UKCP's Education and Training Practice Committee will review standards of education and training for adults and reference the SCoPEd framework within these documents

8.5   The UKCP, as part of the SCoPEd partnership, has engaged in communications by:

- Participating in joint partner events including the June 2022 Q&A session

- Establishing dedicated web pages providing information about SCoPEd implementation

- Creating targeted communications for different stakeholder groups

- Engaging with the wider SCoPEd partnership's communications strategy through the Communications Group

8.6   We concluded that the UKCP 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 UKCP 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   The UKCP's adoption of SCoPEd, with its alignment to Columns B and C, does not conflict with its commitment towards EDI principles. The SCoPEd partnership's commissioned impact assessment examined EDI implications of implementing the framework – the UKCP should act on its recommendations as part of the group or individually where appropriate.

9a: Regulatory functions are underpinned by fairness and equity of access to registrants and service users

9.3   The UKCP actively collaborates within the SCoPEd partnership on training accessibility, stakeholder engagement, and data collection initiatives, as outlined in the SCoPEd Impact Assessment.

9.4   The UKCP has an EDI action plan 'to address any identified disparities in those who are being trained, those who complete the training and those who can access the training in the first place, exploring how we can work with training organisations to raise awareness of institutional discrimination (including anti-racism), and ensuring that the curriculum is reflective of the diverse trainees in UKCP and making the qualification relevant and accessible means making real change to the established way of doing things'.

9.5   All applicants must meet Column B or C requirements, either through accredited training or equivalence assessments conducted via UKCP Organisational Members. The impact assessment revealed that the registrant base is predominantly "white, heterosexual, and over 60," indicating that the high costs of psychoanalytic training and development may limit access for underrepresented groups.

9.6   The UKCP has stated that "Everyone should be able to access long-term, high-quality therapy regardless of their economic situation" and has set its policy aims to develop a "professional psychotherapeutic workforce which is ready and equipped to be part of the NHS response to the mental health crisis." Staff have undergone EDI training, for example in 2023, UKCP staff and key volunteers participated in deaf awareness training.

9b: Understands the diversity of its registrants, service users and complainants and has an awareness of issues that may impact those with protected characteristics as defined by the Equality Act 2010

9.7   The impact assessment highlighted limited demographic data across the SCoPEd partners, including the UKCP. Psychoanalytic training's high costs and lengthy duration may disproportionately affect those from disadvantaged backgrounds, raising concerns about accessibility for underrepresented groups.

9.8   The UKCP's EDI action plan stated that it is "now time to implement long-overdue changes and create a more diverse and inclusive UKCP." In 2023, UKCP began collecting demographic data from all members during the renewals process, alongside an optional survey about their work and practice. UKCP analysed this data and published a report with the findings, available on their website.

9c: Promote and enhance EDI by seeking to understand and act on issues affecting the roles registered and service users

9.9   The UKCP participates in the SCoPEd partnership's stakeholder initiatives to address barriers and improve accessibility. Applications for UKCP Organisational Membership are asked: "Do you have a Diversity and Equality policy consistent with the UKCP Diversity and Equalities Statement. How is it implemented?"

9.10 Concerns raised in the impact assessment and the Share Your Experience consultation focused on barriers to progression between SCoPEd columns. As discussed in earlier Standards, we considered that the UKCP could better communicate its progression pathways (from Column B to C) in line with the aims of the framework.

9.11 We concluded that the UKCP incorporates awareness of EDI issues within implementation of SCoPEd via the group impact assessment and planned initiatives. The UKCP has an action plan to consider and address issues raised, such as the high costs and long duration of psychoanalytic training which can create significant barriers to inclusion for both practitioner and client.

9.12 We have issued Recommendations for the UKCP to better communicate its alignment to the SCoPEd framework and progression pathways for practitioners seeking to advance.

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 UKCP's adoption of the SCoPEd framework. The consultation

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

Consultation Response Overview

10.2   We received nearly 200 responses to our consultation, providing detailed insights into stakeholder perspectives on the SCoPEd framework. The response breakdown was:

- Approximately 5% positive responses

- Around 70% critical responses

- 25% neutral or unclear responses

10.3   The high proportion of critical responses reflects significant concerns within the profession about the framework's development and implementation. While these concerns were directed at the framework broadly rather than specifically at the UKCP, they highlight issues that all partner registers, including the UKCP, should address. The UKCP's situation differs from some other partner registers as its existing qualifications already aligned with the framework's higher levels.

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:

10.5   "The SCoPEd classifications are clear and transparent... Psychotherapists should be classified consistently across all registers to provide consistency and clarity to clients."

10.6   "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."

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

2. Challenges most relevant to the UKCP

10.8   Barriers to Entry and Training Costs Concerns were raised about the affordability of training, which disproportionately affects those from disadvantaged backgrounds. These concerns may be particularly significant for the UKCP due to the cost and length of training. The UKCP has recognised this within its Equity, Diversity and Inclusion Action Plan, with initial steps including encouraging Organisational Members to publish all fees associated with training.

10.9   Transparency in Governance and Decision-Making Respondents raised concerns about a lack of transparency in decisions about SCoPEd's

development and implementation. Feedback emphasised the importance of continued updates and open communication channels, which the UKCP has maintained through its website.

10.10 EDI Challenges Concerns that the registrant base remains predominantly "white, heterosexual, and over 60" suggested systemic barriers to diversity. The UKCP has taken steps to address such concerns, including development of an "Equality Impact Assessment Framework to work with training organisations to raise awareness of institutional discrimination."

10.11 Competency Alignment There were calls for greater clarity on how competencies align with training pathways and equivalency assessments. We have recommended the UKCP provide clear information about alignment to the columns and progression pathways.

3. Broader concerns

10.12 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.

10.13 Practitioner Well-Being Feedback expressed anxiety about the impact on practice, highlighting the need for clear communication and support from all partners, including the UKCP.

10.14 The SYE highlighted challenges for the UKCP 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 register. In line with this, we assessed the likely impacts of the UKCP'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. The UKCP's situation is distinctive as all its registrants align with either Column B or C, reflecting the advanced level of training and practice required for its psychotherapeutic counsellors and psychotherapists.

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 non-discriminatory manner

- At the Column C level, integrating relevant theory and research on diversity and equality into clinical practice

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 UKCP's adoption of the framework:

- While the UKCP's registrants all align with either Column B or C, clarity around this positioning is important for public understanding

- Ongoing discussions about professional titles and terminology may affect how psychotherapeutic counsellors and psychotherapists are perceived

- Consistent application of standards across partner registers remains important

11.6 The UKCP'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 approaches.

11.7 However, the independent impact assessment and feedback from the SYE process identified risks that could negatively affect specific groups if not adequately addressed. These include:

- Registrants: Concerns about transparency, perceived inequities in accreditation, and alignment of qualifications could discourage engagement with the register and undermine confidence

- Employers: Misalignment or inconsistencies in applying SCoPEd competencies across partner registers may cause confusion and hinder workforce planning

- Service Users: Unresolved disputes over titles and competencies could impact public understanding of practitioners' qualifications and roles, potentially reducing trust in the profession

11.8 We have suggested ways for the UKCP to address such concerns, by providing greater information about its integration with the framework on its main webpages and in its key documentation.

11.9 We concluded that there is no evidence to suggest that the adoption of the SCoPEd framework introduces an unaddressed negative impact that would affect compliance with the Standards or the AR programme. However, to sustain confidence and ensure positive outcomes, it is essential that registrants' concerns are continually reviewed, stakeholder engagement is strengthened, and data collection systems are enhanced to monitor the long-term impact of the framework effectively.