

# Accredited Registers Impact Assessment

Accredited Register: NCPS and HS

Type of Review: Standard OneFull Renewal Assessment

Period under review: 2021-2024

Date Approved for Panel: 30 October 2024

## Introduction

Before we make a decision about accreditation, we undertake an impact assessment to understand likely effects on different groups, and the wider health system. We begin to gather the information required for the impact assessment when a Register first applies for accreditation. We consider any changes to impacts when we renew accreditation, and when taking other decisions that affect accreditation status such as imposing Conditions or suspension.

A key part of the impact assessment is consideration of equalities. The Equality Act 2010 imposes a legal duty, the Public Sector Equality Duty on all public bodies to consider the equality impact of its policies and decision making. The duty is known as the Equality Duty and it requires a public authority, in the discharge of its function to consider the following three aspects which form the basis of the duty:

- Consider the impact and eliminate unlawful (direct or indirect) discrimination and any other conduct prohibited under the Equality Act 2010.
- Advance equality of opportunity between people with protected characteristics and those who do not share these characteristics
- Foster good relations between people with protected characteristics and those who do not share these characteristics.

This means that public bodies must consider equality impact on individuals protected under the Equality Act 2010 in carrying out their work. The Authority, therefore, needs to be always mindful of the public duty when carrying out its oversight role which includes the approving of registers. It needs to have 'due regard' to the needs to balance the three aspects which make up the Equality Duty when achieving its goals.

The Equality Impact Assessment is an important tool/mechanism for demonstrating 'due regard' through the consideration of evidence and analysis, actual and potential to identify positive and/or adverse impacts. The key groups we need to consider when making our decisions are, sex, age, ethnicity, disability, religion and belief, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy, and maternity.

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### Impacts

#### Equalities impacts - summary

- The NCPS and HS have not historically collected data about protected characteristics from its registrants or service users. The NCPS and HS have advised us they are in the process of updating their CRM database, which may allow for the collection of this data moving forward. They intend to use this information to promote diversity in their profession.
- The NCPS and HS are a signatory of the Memorandum of Understanding on Conversion Therapy which has been signed by 25 psychology, counselling, therapy and allied organisations and states that '*Organisations with practice members will ensure through training and/or published guidelines that the relevant over-arching ethical principles in their statements of ethical practice are understood and applied when working with sexually and gender diverse clients, as pertaining to the basic standards of honest, competent and non-discriminatory practice to which clients of all identities and orientations are entitled.*'

#### Impacts on groups with protected characteristics

##### Age

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Positive	Children and Young People	Registrants who are on the Children and Young People Register must already be registered with the NCPS as an Accredited Registrant and have demonstrated the <a href="#">Training Standards</a> and <a href="#">Competencies</a> to work with Children and Young People.	No actions required	October 2024

##### Disability

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified

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### *Gender reassignment*

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Positive	People who are seeking support around their gender identity.	The NCPS and HS are signatory of the <a href="#">Memorandum of Understanding on Conversion Therapy (MoU)</a> . This is signed by 25 psychotherapy, counselling, therapy and allied organisations.	No action required	October 2024

### *Marriage and civil partnership*

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
N/A				

### *Pregnancy and maternity*

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
N/A				

### *Race*

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Positive	Racially and ethnically minoritised communities.	The Societies are founding partners in the <a href="#">Coalition for Inclusion and Anti-Oppressive Practice</a> . The Coalition brings together organisations with a		

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		<p>shared mission to improve diversity within the counselling, psychotherapy and psychological therapy professions.</p> <p>Its current focus is promoting inclusive and anti-oppressive professional training as part of a greater vision to address further barriers to inclusive practice, particularly in relation to supporting racially and ethnically minoritised communities.</p> <p>An Equality, Diversity and Inclusion <a href="#">Toolkit</a> has also been developed. This has been offered to all NCPS and HS Training Providers and free training on its use has also been offered.</p>		
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### Religion or belief

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
N/A				

### Sex

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
N/A				

### Sexual orientation

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Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Positive	People who are LGBTQ+	The NCPS and HS are signatory of the <a href="#">Memorandum of Understanding on Conversion Therapy (MoU)</a> . This is signed by 25 psychotherapy, counselling, therapy and allied organisations.	No actions required	October 2024

### Cost and market impacts – summary

- Membership for registrants' costs £150/year. The NCPS and HS also offer student memberships at a reduced rate. The NCPS and HS also offer further benefits to their registrants including the Health Service Discount Card.
- The NCPS told us that they continue to see a steady increase in registration of NCPS members. The registration of HS members appears to have slowed, and the HS are continuing to investigate this to seek ways to ensure that registration increases again.
- In review of the NCPS and HS register, typically, registrants are self-employed and can charge anywhere from £40-£90 per session. The Societies do not consider that the costs of accreditation will result in the need to pass costs directly on to registrants and from them, to service users.

### Social and environmental impacts – summary

- The NCPS and HS noted that they continue to hope that having counselling and psychotherapy registers will help employment opportunities for counsellors and also provide a way of closing the skills and demand gaps in the current state provision of mental health services.
- Employers are reassured by the register once they understand what it represents. Unfortunately, on its own, the register may appear to be an insufficient authority to provide employers (including the NHS) with full confidence in and understanding of registrants.

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- Accreditation through the programme will provide employers with further reassurance that practitioners have met its registration standards including education and training.
- Accreditation is therefore considered to have a positive impact given that it will raise confidence and awareness in the profession, and therefore, increase referrals from GPs, alleviating pressures on the NHS.

### Decision

The Panel noted the above actions and considered the conditions and recommendations highlighted as part of the assessment. The Panel agreed with these actions and considered that it is in the public interest to re-accredit the NCPS and HS.