

Accreditation renewal report

Standards 1-8

National Counselling and Psychotherapy
Society and National Hypnotherapy Society

November 2024

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About accreditation

The Professional Standards Authority (the Authority) accredits registers of people working in a variety of health and social care occupations that are not regulated by law. To become an Accredited Register, organisations holding registers of unregulated health and social care roles must prove that they meet our *Standards for Accredited Registers* (the Standards).

Initial accreditation and full renewal decisions are made by an Accreditation Panel following an assessment of the organisation against the Standards by the Accreditation team. The Panel decides whether to accredit an organisation or not. The Panel can also decide to accredit with Conditions and provide Recommendations to the organisation.

- **Condition** – Issued when a Panel has determined that a Standard has not been met. A Condition sets out the requirements needed for the Accredited Register to meet the Standards, within a set timeframe. It may also reduce the period of accreditation subject to a review or the Condition being met.
- **Recommendation** – Actions that would improve practice and benefit the operation of the Register, but which is not a current requirement for accreditation to be maintained.

This assessment was carried out against our Standards for Accredited Registers¹ (“the Standards”) and our minimum requirements for the Standards as set out in our Evidence framework². More about how we assess against Standard One can be found in our Supplementary Guidance for Standard One³.

We used the following in our assessment of the NCPS and HS:

- Documentary review of evidence of benefits and risk supplied by the NCPS and HS and gathered through desk research
- Documentary review of evidence supplied by the NCPS and HS and gathered from public sources such as its website
- Due diligence checks
- Share your experience responses
- Site visits including discussions with members of staff
- Observation of a Board Meeting on 16 October 2024.

¹ https://www.professionalstandards.org.uk/docs/default-source/publications/standards/standards-for-accredited-registers.pdf?sfvrsn=e2577e20_8

² https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-evidence-framework-for-standards.pdf?sfvrsn=55f4920_9

³ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-supplementary-guidance-for-standard-one.pdf?sfvrsn=3e5f4920_6

The Outcome

The Accreditation Panel met on 30 October 2024 to consider the National Counselling and Psychotherapy Society (NCPS) and the National Hypnotherapy Society (HS) (referred to in this document as the "Societies"). The Panel was satisfied that the NCPS and HS could meet with Conditions, all the Standards for Accredited Registers. **We therefore decided to accredit the NCPS and HS with Conditions**

We noted the following **positive findings**:

- The Societies' websites are easy to use and written in plain English which the Accreditation Panel considers a positive finding given this increases accessibility.
- The Societies publish clear information pertaining to what services their registrants should and should not be providing. The Societies make it clear that any adjunctive therapies are not accredited by themselves nor by the Accredited Registers Programme.
- The Societies' complaints policies are written in a way which is easy to understand, and the Accreditation Panel found this to likely be of great benefit to those engaging with the complaints process given the transparency.
- The Societies ensure that all key documents are accessible from the website at all times, given these remain in the header of all webpages.

We issued the following Conditions to be implemented by the deadline given:

Conditions	Deadline
Standard Two	1. The NCPS must make it clearer that the Coaching sub-register is not accredited by the PSA. 3-months
	2. The NCPS/HS must formally develop a registration appeals process and publish this on their website so that it is easily accessible to those who may wish to engage with the appeals process. 3-months
Standard Six	3. The NCPS/HS must develop a policy for managing conflicts of interest. 6-months
	4. The NCPS/HS must develop a robust business continuity policy to ensure it can mitigate any threats to regular business practices. 12-months
	5. The NCPS/HS must develop a policy in which they formalise their organisational risk management processes. 6-months

We issued the following Recommendations to be considered by the next review:

Recommendations	
Standard Two	1. The NCPS may wish to consider how they can more effectively display a registrant's client group/s in line with their affiliation with a sub register. The NCPS should consider how they can ensure that it is clear for those registrants who may appear on the relationship and psychosexual register, that this practice is offered to adults only.
Standard Six	2. The NCPS/HS may wish to develop and document their approach to ensuring diversity in the composition of their senior leadership team, particularly in relation to ensuring fair recruitment and training processes.
Standard Seven	3. The NCPS/HS may wish to consider broadening out their risk management related to suicide and self-harm away from solely crisis management, to working with clients that may be at risk of suicide and self-harm, recognising that this is an area that is changing in terms of best practice and clinical guidelines.

About the Register

This section provides an overview of the NCPS and HS and its register.

Name of Organisation	The National Counselling and Psychotherapy Society The National Hypnotherapy Society
Website	NCPS Counselling Matters National Hypnotherapy Society Hypnotherapy Helps
Type of Organisation	Private companies limited by guarantee without share capital. NCPS: 05861051 HS: 03739912
Role(s) covered	Counsellors, Psychotherapists, Hypnotherapists
Number of registrants	11 573 (as of 23 October 2024)
Overview of Governance	The National Counselling and Psychotherapy Society (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 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.’ The Council includes its Chair, Chief Executive, Deputy Chair, Heads of Departments and four lay members.
Overview of the aims of the register	<p>NCPS: The NCPS’ ultimate aims are to nurture and protect the 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.</p> <p>HS: The National Hypnotherapy Society is a Learned Society whose primary purpose is the advancement of the knowledge of hypnotherapy and the fostering of professional hypnotherapy expertise through training, accreditation and continued professional development of our members. The HS seeks to contribute to public wellbeing both through the use of hypnotherapy and by ensuring that hypnotherapists are safe, competent and ethical in practice.</p>

Inherent risks of the practice

This section uses the criteria developed as part of the Authority’s *Right Touch Assurance tool*⁴ to give an overview of the work of counsellors, psychotherapists and hypnotherapists.

Risk criteria	
1. Scale of risk associated with Counsellor, Psychotherapist and Hypnotherapist	NCPS and HS hold two separate registers under a common governance system. The NCPS was founded, and launched as, a professional body prior to our becoming an Accredited Register holder. The Society does not operate any training, but rather operates a system of accrediting training to demonstrate that said training meets the requirements for registration.
2. a. What do Counsellor, Psychotherapist and Hypnotherapist do?	The NCPS holds a register of practitioners. The roles registered are Counsellor, Psychotherapist, includes Children and Young Persons’ (CYP) Therapist, Person-Centred Experiential Therapist and Hypnotherapist. Counsellors and Psychotherapists practising diverse types of therapies.

⁴ https://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/right-touch-assurance---a-methodology-for-assessing-and-assuring-occupational-risk-of-harm91c118f761926971a151ff000072e7a6.pdf?sfvrsn=f537120_14.

<p>b. How many Counsellors, Psychotherapist and Hypnotherapist is there?</p> <p>c. Where do Counsellor, Psychotherapist and Hypnotherapist work?</p> <p>d. Size of actual/potential service user group</p>	<p>The NCPS have mentioned the following types of therapies on their website:</p> <ol style="list-style-type: none"> 1. Behavioural therapy 2. Children and young people’s therapy 3. Cognitive analytical therapy 4. <i>Cognitive Behavioural Therapy (CBT)</i> 5. <i>Cognitive therapy</i> 6. <i>Emotion Focused Therapy</i> 7. <i>Existential Therapy</i> 8. <i>Family</i> 9. <i>Gestalt</i> 10. <i>Humanistic</i> 11. <i>Hypnotherapy</i> 12. <i>Integrative approaches</i> 13. <i>Internal Family systems</i> 14. <i>Multimodal Therapy</i> 15. <i>Neuro- linguistic programming</i> 16. <i>Person centred therapy</i> 17. <i>Person centred Experiential Therapy for depression (PCET CfD)</i> 18. <i>Pluralistic therapy</i> 19. <i>Psychoanalysis</i> 20. <i>Psychodynamic Counselling</i> 21. <i>Psychosexual Therapy</i> 22. <i>Relationship Therapy</i> 23. <i>Solution- Focused (Brief Therapy)</i> 24. <i>Transactional analysis</i> <p>b. The NCPS and HS have 11 573 (as of 23 October 2024).</p> <p>c. Members are UK-based (registrants work in England, Scotland, Northern Ireland, and Wales). Some registrants work in NHS, private clinics, the voluntary sector and may work in other settings such as schools and local authorities.</p>
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	<p>d) It is estimated that 1 in 6 people a week experience a common mental health problem. A 2021 survey of children and young people’s mental health found that 17.4% of children aged 6-16 had a probable mental health disorder in 2021, up from 11.6% in 2017.</p>
<p>3. Means of assurance</p>	<p>The Register includes therapists who have met NCPS’s and HS’s standards for registration. The means of assurance will depend on the practise setting. For managed premises such as NHS settings and schools, there will be criminal records and other pre-employment checks required.</p> <p>NCPS mentioned that ‘screen all potential registrants and seek to ensure that do not register people who are unsuitable, DBS check which must be arranged by their employer or voluntary agency, clinical supervisor on a regular basis etc. Application process also has requisite checks.</p>
<p>3. About the sector in which Counsellor, Psychotherapist and Hypnotherapist operate</p>	<p>The NCPS Therapist Directory has around 14000 therapists who offer services to the public. Registrants are employed by public services such as schools, NHS, local authorities, and other organisations which provide counselling services.</p> <p>The HS Therapist Directory has around four thousand therapists who offer services to the public. Most hypnotherapists are self-employed and work in private practice, choosing their own clients or patients, and hypnotherapy is not provided via the NHS or Local Authorities, other than via individual GP recommendation or potentially via budget allocation from a CCG.</p> <p>Mental health provision within the NHS is provided across three main settings: care in the community, inpatient care, and secure care. Services can broadly be categorised as adult services, children and young people’s services, urgent and crisis care, and forensic services⁵. Although there are differences in the four UK models, these categorisations tend to apply across all.</p> <p>A considerable number of people access mental health and wellbeing support from private practitioners. In some cases, this may be due to long waiting lists for talking therapies on</p>

⁵ [The state of the NHS provider sector](#)

	the NHS, or to access treatment that is not available through the NHS. People can access private providers through a referral from an NHS GP, or by searching for one themselves ⁶ .
<p>4. Risk perception</p> <p>· <i>Need for public confidence in Counsellor, Psychotherapist and Hypnotherapist?</i></p> <p>· <i>Need for assurance for employers or other stakeholders?</i></p>	<p>As registrants are self-employed, it is important that members of the public have confidence in the practitioners they choose to deliver therapy. The broad range of modalities offered, many of which may not be available as part of mainstream NHS services, make it important that the public are aware of what to expect from practitioners.</p> <p>Since registrants working with children and/or vulnerable adults, it is important that the public can have confidence there are appropriate safeguards in place.</p>

Assessment against the Standards

Standard One: Eligibility and ‘public interest test’

Summary

The Accreditation Panel found it is in the public interest to accredit the NCPS/HS. The Accreditation Panel found that Standard One is met.

Accreditation Panel findings

1.1 We completed our Standard One assessment for the NCPS/HS in October 2024. We found that the NCPS’ and HS’ registers fall within the scope of the Accredited Registers Programme. We considered that the work of counsellors, psychotherapists and hypnotherapists can be beneficial. We found it is in the public interest to have a register of practitioners who meet appropriate standards of competence, conduct and business practice as required by the NCPS and HS.

1.2 Consequently, the Accreditation Team found that Standard One was met.

2: Management of the register

Summary

The Accreditation Panel found that Standard Two was met. It issued the following Conditions and Recommendations:

⁶ [Private sector mental health support - Mind](#)

Conditions:

- **Condition One:** The NCPS must make it clearer that the Coaching sub-register is not accredited by the PSA
- **Condition Two:** The NCPS/HS must formally develop a registration appeals process and publish this on their website so that it is easily accessible to those who may wish to engage with the appeals process.

Recommendation:

- **Recommendation One:** The NCPS may wish to consider how they can more effectively display a registrant's client group/s in line with their affiliation with a sub register. The NCPS should consider how they can ensure that it is clear for those registrants who may appear on the relationship and psychosexual register, that this practice is offered to adults only.

Accreditation Panel findings

- 2.1 The NCPS have a large range of membership categories available. Members can either be a Registrant, or non-Registrant member. Registrant Members form the Accredited Register, which is accredited by the Professional Standards Authority.
- 2.2 Registrant Members will fall into the following categories: Accredited Registrant, Accredited Professional Registrant, Senior Accredited Registrant or Fellow Registrant. The NCPS clearly publishes the registration routes to each membership category, on their [website](#).
- 2.3 In addition to their main Accredited Register, the NCPS also has two-sub registers; the Children and Young People's Register, and the Relationship and Psychosexual Register. In order to be on these two specialist registers, members must already hold, at a minimum, Accredited Registrant status and complete further competencies as set on their [website](#).
- 2.4 Similarly to the NCPS, the HS publishes their membership grades and criteria on their website. Registrant members who form part of the Accredited Register can obtain membership as a Registrant Member, Accredited Member or Fellow Registrant.
- 2.5 During our assessment of the NCPS' website, we identified a potential area of concern, in that we found it may be confusing for a member of the public to understand that the NCPS Life Coach register is not a part of the PSA Accredited Register. We considered that a number of registrant profiles display 'Accredited' on them, and while from our own enquiries with the NCPS, realise this to be in relation to their membership category as a counsellor and/or psychotherapist, considered this was not abundantly clear

to a member of the public. As such, the Accreditation Panel decided to impose the below condition:

Condition One: The NCPS must make it clearer that the Coaching sub-register is not accredited by the PSA.

2.6 Furthermore, during our assessment of the Societies' management of their registers, we identified some potentially misleading registrant profiles. We noted that registrant profiles for those who appear on the Relationships and Psychosexual sub-register, and also on the Children and Young People Register, could potentially be misleading given under the 'clients we work with' profile, both adults and children will be highlighted. We considered that when viewing a registrant's profile alone, it is not clear that Relationships and Psychosexual therapy is offered to adults only. As such, the Accreditation Panel issued the below recommendation:

Recommendation One: The NCPS may wish to consider how they can more effectively display a registrants client group/s in line with their affiliation with a sub register. The NCPS should consider how they can ensure that it is clear for those registrants who may appear on the relationship and psychosexual register, that this practice is offered to adults only.

2.7 The NCPS and HS share the same process for registration appeals. In providing evidence for this assessment, the Societies told us that those who wish to appeal their registration decision must contact the Membership Services Officers (MSO) Team with details of the reason for appealing. The MSO will liaise with the Assessment Team, of which, senior members will make a decision regarding the appeal. Where necessary, complex cases will be examined by the Professional Standards Committee.

2.8 While we understood the information provided by the Societies, in conducting our own research, we were unable to identify this information on the Societies' public website, and therefore considered it would be difficult for a prospective registrant wishing to appeal their registration decision to know how to do so. As such, the Accreditation Panel implemented the below condition:

Condition Two: The NCPS/HS must formally develop a registration appeals process and publish this on their website so that it is easily accessible to those who may wish to engage with the appeals process.

2.9 The NCPS has clear [registrant entry requirements and education and training standards](#). At a minimum, registrant members need to have completed an Ofqual Level 4 (or equivalent) diploma in core or basic one-to-one counselling or psychotherapy. Similarly, the HS has clear [registrant entry requirements and education and training standards](#). At a minimum, registrant members need to have completed an Ofqual Level 3 (or equivalent) diploma in Hypnotherapy Practice.

- 2.10 The Societies have a mandatory audit process pertaining to CPD. Over the course of a calendar year, they randomly audit 2.5% of registrants who have been on the Accredited Register for one year or more. If audited, registrants are required to provide a signed audit form, current photo ID, CPD for the previous 12-months, evidence of their current insurance and a supervisor's report.
- 2.11 Both the [NCPS](#) and [HS](#) have webpages in which they publish their Professional Conduct Notices. Restrictions on practice will also be displayed on a members register entry.
- 2.12 The Societies are signatories of the Information Sharing Protocol in which Accredited Registers (ARs) share information to support Mutual Recognition of outcomes of disciplinary proceedings. The Societies told us their policy is that sanctions imposed by another AR or relevant regulatory body will be referred to on the Societies' websites and removed in line with the other AR's procedures. That is, removal from another AR or relevant regulatory body will constitute removal from the Societies' AR's. Furthermore, in line with their Terms and Conditions of membership, members are obligated to notify and confirm the outcome of any complaints made against them to another Accredited Register.
- 2.13 A former registrant who has been removed from the Societies' Registers following the outcome of a disciplinary hearing may apply to rejoin the Register. Both the [NCPS](#) and [HS](#) publish information pertaining to their Restoration process. An application for restoration cannot be made until five years have elapsed since the removal, except in circumstances where, as part of the original complaints process, a panel varied this condition. In addition, a former Registrant may not make more than one application for restoration in any twelve months. If a former Registrant makes two applications for restoration which are refused, the Professional Standards Committee may also direct that the applicant's right to make further application is suspended indefinitely and imposing a Barring Order.

Standard 3: Standards for registrants

Summary

The Accreditation Panel found that Standard Three was met.

Accreditation Panel findings

- 3.1 Registrants of the Societies must abide by their Terms and Conditions of Membership as well as their Code of Ethics. The Societies' Codes of Ethics stipulate that registrants must only provide a service to clients in areas that they are trained and competent to do so and ensure that they only work within their scope of practice. The NCPS also provide further guidance to their registrants by way of issuing Good Practice Guidelines, which we consider a positive finding.

- 3.2 We also reviewed the Societies' Safeguarding Policies, which are published on their respective websites. The Code of Ethics also stipulates that registrants have an ethical responsibility towards clients regarding confidentiality and safeguarding considerations.
- 3.3 We note the NCPS have [published information](#) on their website regarding the use of [NICE Guideline 225: Self-harm: assessment, management and preventing recurrence](#). NG225 makes it clear that risk assessment tools should not be used to predict future suicide or repetition of self-harm as they are not accurate measures. The Accreditation Panel encouraged the NCPS to engage with the Staying Safe from Suicide and Self-Harm guidance when it is produced to ensure it remains up to date in relation to providing the correct and accurate information to their registrants.
- 3.4 The Societies also publish a number of policies on their public websites relating to professional behaviours. These include Duty of Candour, Whistleblowing and Code of Ethics policies to encourage accountability, honesty, integrity and respect. Coupled with this, is a registrant's requirement to comply with General Data Protection Regulation (GDPR) requirements as set out by the ICO and is further explored in the Code of Ethics. We reviewed evidence to demonstrate that the Societies provide a number of further guidelines to their registrants to ensure they are complying with GDPR. These include Record Keeping guidelines and Communications guidance.
- 3.5 The Societies' Terms and Conditions require that registrants inform clients of their right to make a complaint under the Societies' Complaints Procedure if they remain dissatisfied with the registrants own complaints process.
- 3.6 Further, the Societies confirm a registrant holds appropriate indemnity cover on application, upon request from the society and if called for audit.
- 3.7 The Accreditation Panel is satisfied that the Societies have appropriate standards for registrants.

Standard 4: Education and training

The Accreditation Panel found that Standard Four was met.

Accreditation Panel findings

- 4.1 The NCPS told us that in devising their standards for education and training, they consulted [QAA Subject Benchmark Statement for Counselling and Psychotherapy](#) 2013, and have subsequently reviewed and revised their Standards in line with the updated 2022 version. They also viewed the [Skills for Health Competencies for Psychological Therapies](#) PT01-PT49. The NCPS' Standards have now also been mapped to the [SCoPED Framework](#). A [Notification of Change](#) is currently underway for the NCPS.

- 4.2 The [HS' Training Standards](#) comply with Hypnotherapy National Occupational Standards.
- 4.3 The NCPS and HS also ensure that their accredited courses are providing adequate training through their renewal and re-accreditation process. The quality assurance process includes a site visit to meet teaching staff and students, evaluation of the teaching venue, and observation both teaching and skills practice sessions to ensure these are compliant with the Training Standards. Full re-accreditation occurs every 5 years in line with the requirements of universities and other professional bodies.
- 4.4 As well as adhering to the Societies' Standards of Training and Education, all Training Providers are required to have a satisfactory Equality, Diversity and Inclusion (EDI) policy. We also reviewed evidence of such EDI training and are satisfied the training ensures that registrants are equipped to care for diverse populations. The Societies also have a 'Race is Complicated' EDI toolkit which is available to training providers to support their own EDI policies as well as use in their course content to support knowledge and learning for students.
- 4.5 We also reviewed evidence of education and training about the wider health and social system. The Standards of Training and Education focus on this in a range of different areas including teachings which focus on recognising one's own professional limitations and referring to another healthcare practitioner, assessing possible contra-indications, liaising with other healthcare practitioners involved in a client's care, and only providing service to clients in an area which they are trained and competent to do so.
- 4.6 The Societies websites provide clear information about the type and level of qualification required for entry to the register. They also publish equivalent routes and complex applications, of which, may be referred to the Societies' Professional Standards Committee for case review. Those who hold membership with another Accredited Register will also be granted membership with the NCPS/HS.

Standard 5: Complaints and concerns about registrations

The Accreditation Panel found that Standard Five was met.

Accreditation Panel findings

- 5.1 The Societies publish their complaints policy on their website. The Accreditation Panel noted this is easily accessible as it is in a banner which is displayed in the header of the website. This is considered good practice given its easy to find placement. The complaints procedure is set out in a step-by-step matter and is written in a way which is easily understood.
- 5.2 The Societies clearly set out at what stage of the complaints process an appeal can be made. Appeals can be made by both parties (that is, the

complainant and the registrant), under step 4 and step 5 of the complaints procedure.

- 5.3 The Societies have clear and published processes on their websites pertaining to their complaints procedure. The complaints procedure notes that complaints can be made in different methods (for example via braille or audio), or on behalf of a complainant (for example by a support worker). The Societies are understanding of the fact that different users may have different requirements to engage with the complaints process and are open to offering further support if and when required.
- 5.4 Panel members who sit on the complaints panels for the NCPS and HS are comprised of highly experienced practitioners and lay members. These include specialists in fields relevant to the Relationship/Psychosexual and Children and Young People specialist registers.
- 5.5 The Societies advised us they have started the process of providing EDI training to all panel members, and that this will be completed by the end of 2024. Furthermore, the Accreditation Panel considered information provided by the Societies indicating that they make use of industry network resources such as the Professional Associations Research Network (PARN) to help them develop and maintain good practice.
- 5.6 Both the NCPS and HS have an Indicative Sanctions Guideline to ensure that disciplinary outcomes are consistent. Furthermore, the Societies also undergo an annual assessment by an Independent Assessor who verifies the consistency of the disciplinary process and outcomes. The Independent Assessor will review a number of cases and will determine if the decision made was sufficient. The Independent Assessor will also provide feedback on common themes or findings to inform areas that the Societies may wish to address.
- 5.7 In circumstances where there may be serious safety or public protection concerns, the NCPS and HS are able to issue an Interim Suspension Order to temporarily remove a registrant from the register. A suspension may also occur where a member has been practising as if they are a registrant (fully professional membership), when they are not (for example, where they hold student membership but are seeing clients as if they are a registrant).
- 5.8 The adjudication of complaints is separate from governance boards, committees and the chief executive. The Independent Complaints Panel (IP) has the full delegated authority of the Societies to take decisions on complaints about its registrants or members. The Society's Ethics Officer has the power to decide whether a complaint is suitable for referral to the Assessment Panel, who may in turn decide to refer the complaint to the Independent Complaints Panel for a formal hearing where the complaint is a

fitness to practise or public safety issue and there is a realistic prospect of a finding that may result in removal or suspension from the register.

5.9 The Assessment Panel is comprised of three members; a Chair and two other members, of which there must be at least one lay representative. The Independent Complaints Panel is comprised of an independent lay Chair and two registrants. Appeals are considered by an independent party who is not a part of any Governance Board or Committee. The Accreditation Panel were satisfied there is a clear separation between management of the register and the complaints and disciplinary process.

5.10 As set out under Step 5 of the Complaints Process, the Professional Conduct Officer is responsible for taking on the role as prosecutor. There is no evidence to suggest complainants are required to prosecute their complaint themselves.

5.11 The Accreditation Panel reviewed the Societies policy for reporting concerns to other relevant agencies (such as the Police or Social Services) and were satisfied these are adequately managed by senior staff.

5.12 The Societies are signatories of the Information Sharing Protocol in which Registers share information to support mutual recognition of outcomes of disciplinary proceedings. Further, the NCPS and HS will inform all other ARs if their complaints process leads to the removal of a registrant from their register.

5.13 If the outcome of the disciplinary process results in a sanction being imposed, details of sanctions will appear as an annotation to a registrant's register entry. In addition, an outline of the case will be placed on the Societies' websites on the 'Professional Conduct Notices' webpages. A note of the complaint will be added to the member's file. Upon completion of the sanction, the Societies will change the online register to reflect that the sanction has been met. The Societies will display the "Sanction Met" annotation and the outline of the case under the 'Outcome of Complaints' of the above webpage for a further period of 6 months after completion of the sanction. The Registrant's file will be updated.

Standard 6: Governance

The Accreditation Panel found that Standard Six was met. It issued the following Conditions and Recommendations:

Conditions

- **Condition Three:** The NCPS/HS must develop a policy for managing conflicts of interest.
- **Condition Four:** The NCPS/HS must develop a robust business continuity policy to ensure it can mitigate any threats to regular business practices.

- **Condition Five:** The NCPS/HS must develop a policy in which they formalise their organisational risk management processes.

Recommendations:

- The NCPS/HS may wish to develop and document their approach to ensuring diversity in the composition of their senior leadership team, particularly in relation to ensuring fair recruitment and training processes.

Accreditation Panel findings

- 6.1 The NCPS and HS are led by a single 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.’ The Council includes its Chair, Chief Executive, Deputy Chair, Heads of Departments and four lay members. The Societies have an Independent Assessor who “reviews and reports to the Chair and Chief Executive of the Societies on matters of Audit and Governance.”
- 6.2 We considered that the Societies make reference to how they manage conflicts of interest in the constitution of their Council, however noted in the absence of a formal policy, the minimum requirement for this standard was not met. As such, the Accreditation Panel imposed the following condition:
- Condition Three:** The NCPS/HS must develop a policy for managing conflicts of interest.
- 6.3 We reviewed the Societies’ Organisational Chart to assess how they ensure clear separation between their professional body and management of register functions and training and education providers and were satisfied they had appropriate mechanisms in place. The Societies are comprised of a number of committees which see to specific areas including Professional Standards, Professional Conduct and Diversity and Inclusion. Furthermore, the societies are also assessed by an Independent Assessor on an annual basis to ensure they are operating effectively.
- 6.4 The Societies also publish their key governance documents including minutes of their Council meetings online. The Societies also publish their complaints procedure on their website, in which they will investigate complaints against the actions of themselves and their staff.
- 6.5 We reviewed the Societies’ Privacy Policy in which they set out how they manage, process and hold data; we found this to be in line with GDPR.
- 6.6 As part of the assessment process, the Societies told us they have business continuity arrangements in place, however, they did not provide us any evidence of this. The information provided to us focused on the Societies’ IT continuity processes, however, the Accreditation Panel found that a more robust business continuity plan was required to ensure the effective running of

the Societies in the event of an emergency or significant change (for example a change in senior leadership). As such, the Accreditation Panel imposed the following condition:

Condition Four: The NCPS/HS must develop a robust business continuity policy to ensure it can mitigate any threats to regular business practices.

6.7 In relation to organisational risk management, we found that the Societies track risks through an organisational risk matrix. As part of the re-accreditation process, we attended the Societies' Council Meeting and evidenced them discussing the risk matrix, however, note in line with our Standards for Accredited Registers, a clear document approach to risk management is required. Given this, we asked the Societies to provide us evidence of their policies or procedures pertaining to risk management and were told that they are currently writing a policy to formalise their processes. The Accreditation Panel acknowledged the work the Societies are currently completing in terms of developing this policy, however noted in the absence of a formal policy, this standard is not met. As such, the Accreditation Panel issued the following condition:

Condition Five: The NCPS/HS should develop a policy in which they formalise their organisational risk management processes.

6.8 The Accreditation Panel were satisfied the Societies had appropriate processes in place regarding strategic leadership and reviewed evidence of Governance arrangements and duties and expectations for the Council and its members to ensure they exercise effective control. The Accreditation Panel also found it positive that the Societies publish this information on their website which encourages effective operations and transparency.

6.9 The Council is made up of the Chair, Chief Executive, senior leadership including department heads and four lay members. The Societies told us that their lay council members come from non-counselling backgrounds and provide the council with a broad range of perspectives. The Accreditation Panel were satisfied that these governance arrangements included a diverse range of perspectives.

6.10 The Societies told us they have fair processes in place to seek to achieve diversity in the composition of the senior leadership team, Board and Committee members, however, do not appear to have a written policy in place reflecting this. The Societies told us that all of their Senior Leadership Team have undergone anti-oppressive training and the EDI committee is working with the Societies to explore ways to enhance the Societies' diversity. The Accreditation Panel acknowledged that the Societies are working towards achieving greater diversity in their senior positions, however, note in line with our Standards for Accredited Register, we require this to be a formalised process. As such, they imposed the below recommendation:

Recommendation: The NCPS/HS may wish to develop and document their approach to ensuring diversity in the composition of their senior leadership team, particularly in relation to ensuring fair recruitment and training processes.

Standard 7: Management of the risks arising from the activities of registrants

The Accreditation Panel found that Standard Seven was met. It issued the following Recommendation:

Recommendation:

- The NCPS/HS may wish to consider broadening out their risk management related to suicide and self-harm away from solely crisis management, to working with clients that may be at risk of suicide and self-harm, recognising that this is an area that is changing in terms of best practice and clinical guidelines

Accreditation Panel findings

7.1 The Accreditation Panel reviewed the Societies' Risk Matrix in which they assess risks arising from the activities of registrants. They considered that these risks are reviewed on an annual basis, with new risks added and discussed upon identification.

7.2 During the Accreditation Panel, we considered the areas that this risk matrix covers. The Accreditation Panel found that while the Societies consider risk related to suicide and self-harm, this appears to be from the perspective of crisis management. The Panel felt that given that counsellors and psychotherapists are likely to be working with a wide range of clients whom present with a range of needs, a more holistic approach is required to encompass the needs of all clients. The Accreditation Panel considered that this is an area which is continually changing in terms of best-practice case management and encouraged the Societies to ensure their risk matrix is updated accordingly. As such, the Accreditation Panel issued the following recommendation:

Recommendation: The NCPS/HS may wish to consider broadening out their risk management related to suicide and self-harm away from solely crisis management, to working with clients that may be at risk of suicide and self-harm, recognising that this is an area that is changing in terms of best practice and clinical guidelines.

7.3 The Societies publish clear information about all the different modalities of therapy which their registrants offer. The Accreditation Panel considered this to be a positive finding in that the information is clearly set out in a way that is distinguishable and would be easy for a member of the public to understand. Furthermore, the NCPS and HS make it clear that while their registrants may offer adjunctive therapies, only the practice of counselling, psychotherapy and hypnotherapy falls under the accredited register and that the Societies clearly set out what their registrants can and cannot do.

Standard 8: Communications and engagement

The Accreditation Panel found that Standard Eight was met.

Accreditation Panel findings

- 8.1 The Societies provide clear and accessible information on their websites about the roles it registers and the Accredited Registers Programme. The Societies told us they recently launched new branding, with the goal of making information clearer and reader friendly. The Societies have also embedded an accessibility tool 'ReciteMe' which allows users to change the websites by language, scale, colour and audio for more accessible use.
- 8.2 The Societies are committed to collaborating with other Accredited Registers and key stakeholders to enhance public protection. This is evident by their engagement with the Accredited Registers Collaborative, SCoPED Partnership, Memorandum of Understanding on Conversion Therapy and collaboration with a range of other professional health bodies.
- 8.3 As an area of good practice, the Accreditation Panel noted that the Societies publish all key information on their website and that their key processes (for example their complaints process) are highlighted in the top banner of their webpage.
- 8.4 Furthermore, the Societies have a variety of routes to seek and understand the views and experiences of service users and stakeholders and incorporate these findings into bettering the running of their accredited registers programme.
- 8.5 The Accreditation Panel found that the Societies provided clear information on accreditation for all members and stakeholders. They also provide additional guidance to registrants on the use of the Accredited Registers Quality Mark and ensure that it is only used by registrants working in the United Kingdom.

Share your experience

We ran a public consultation for the NCPS and HS between 8 August 2024 and 17 September 2024. We did not receive any responses.

Nonetheless, we received 8 submissions since the NCPS' and HS' last assessment, which were considered as a part of this full renewal assessment. The SYE responses highlighted the following themes which are discussed below:

Standard Five

- We received concerns regarding the complaints process. All the concerns raised issue with the length of time it took the Societies to deal with these matters.

Standard Eight

- Similarly to the concerns raised above, we received information in which those who have contacted the NCPS/HS are dissatisfied with the length of time it took to receive a response to concerns raised/emails/other correspondence.

In review of the above information, we are satisfied that the Societies have appropriate practices in place to ensure the timeliness of their communications and engagement with stakeholders and their members. In circumstances where matters fall out of expected timeframes, it appears that these are due to matters beyond the Societies' control (for example, an extension request) and does not appear to be indicative of a shortcoming on their behalf which would require further investigation. We also have considered that there has been an increase in the number of complaints received over the past 12-months, which is proportionate to an increase in registrant membership, and note that the NCPS/HS have recently recruited a new Professional Conduct Officer to assist with workload concerns. In light of the above information, we are satisfied with the NCPS and HS' approach and will ensure to check in on these matters moving forward to ensure no further concerns are identified.

Impact assessment (including Equalities impact)

We carried out an impact assessment as part of our decision to accredit the NCPS and HS. This assessment included an equalities impact assessment as part of the consideration of our duty under the Equality Act 2010.

The impact assessment found there is no discernible impact on disability, marriage and civil partnership, pregnancy and maternity, religion or belief or sex. However, there is a positive impact relating to age, gender reassignment, race and sexual orientation.

We considered the positive social impacts of re-accrediting the Societies and considered that accrediting the Societies, as a counselling and psychotherapy register, and hypnotherapy register, will provide a way of closing the skills and demand gaps in the current state provision of mental health services. Accreditation is 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.