

Initial Accreditation Report

National Council of Integrative Psychotherapy
(NCIP)

2 November 2023

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The Process

The Professional Standards Authority (the PSA) 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 decisions are made by an Accreditation Panel following an assessment of the organisation against the Standards by the Accreditation team. The Accreditation Panel decides whether to accredit an organisation or not. They can also decide to accredit with Conditions and issue Recommendations to the organisation.

- **Condition** – Issued when an Accreditation 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 Accredited Register, but which is not a current requirement for accreditation to be maintained.

This assessment was carried out against the Standards for Accredited Registers (April 2016)¹ and the new Standard One introduced in 2021 by the PSA and which includes the ‘public interest test’. Standard One checks eligibility under our legislation, and whether accreditation is in the public interest. More about how we assess registers against Standard One can be found in our *Supplementary Guidance for Standard One*².

We used the following in our assessment of the NCIP:

- Documentary review of evidence of benefits and risk supplied by the NCIP and gathered through desk research.
- Documentary review of evidence supplied by the NCIP and gathered from public sources such as its website.
- Due diligence checks.
- Share your experience responses.
- Site visits including discussions with members of staff.
- Interviews with the Chair, Director of Operations, the Registrar and the Risk Assessment Officer (later became the Director of Risk).
- Observation of a Senior Management Team Meeting 28 April 2023.
- Assessment of NCIP’s complaints procedures.

¹ [AVR - Standards for Accreditation \(professionalstandards.org.uk\)](https://www.professionalstandards.org.uk/AVR-standards-for-accreditation)

² [Accredited Registers supplementary guidance standard one \(professionalstandards.org.uk\)](https://www.professionalstandards.org.uk/accredited-registers-supplementary-guidance-standard-one)

The Outcome

The Accreditation Panel met on 13 September 2023 to consider the NCIP's application for accreditation. The Accreditation Panel was not satisfied that the NCIP met or could meet with Conditions all the *Standards for Accredited Registers*. **We therefore decided not to accredit the NCIP.**

This followed an initial Panel meeting on 9 December 2022 where the Accreditation Panel found that Standards 3, 4, 6 and 8 were met and that Standard 1 was met with Conditions. The Accreditation Panel was not satisfied that Standards 2, 5, 7, 9, 10 and 11 were met. The Accreditation Panel decided that accreditation could not be granted without some further actions being taken by the NCIP to address those areas. The Accreditation Panel decided to adjourn the meeting to allow the NCIP time to complete the following actions:

Action Number	Action	Standard (s)
1	The NCIP should ensure that its governance and oversight arrangements are clear and transparent to the public. This should include information about its governance arrangements, including how the company is run, how decisions are made within each of its functions, where financial decisions are taken and what checks and balances there are for individual decisions affecting the Register.	Standards 2, 5, 7, 9, 10 and 11.
2	The NCIP should review, update, and publish the terms of reference for its Committees and Management Advisory Board to ensure that they set out their roles and responsibilities in a way that is clear and transparent for the public.	Standards 2, 5, 7, 9, 10 and 11.
3	The NCIP should be clear about its oversight arrangements it has in place to ensure the fairness and consistency of decisions made about registration, complaints and education and training.	Standard 2, 5, 7, 9, 10 and 11.
4	The NCIP should develop independent verification or quality assurance mechanisms for its education and training decisions.	Standards 2, 5, 7 and 9
5	The NCIP should set out how it documents its assessment processes for education and training courses. This should include information on the assessment, renewals and how the NCIP will handle concerns.	Standard 9
6	The NCIP should develop and publish policies for registration appeals, and for restoration and readmission to the register.	Standard 10
7	Decision making about complaints should be separate from governance Boards, Committees, and the Chief Executive (or 7 equivalent). Decision makers at different stages of the process including appeals	Standards 2, 5, 7 and 11

	should not have been previously involved in the complaint. The NCIP should review its process to ensure that there is separation between the investigations, adjudication, and appeals stages.	
8	The NCIP should review, update, and publish its complaints handling procedures. The updated procedures should: a) Give registrants the right to reply to any allegations and otherwise be Human Rights Act compliant in terms of fairness to registrants. b) Provide clear information on its criteria and process for decision making about how complaints progress. This should include how complaints are triaged, and the factors it considers in determining whether mediation is appropriate in individual cases. c) Make provision for hearings where facts are disputed and ensure that hearings panels are independent of the organisation and ensure that there are mechanisms to appeal decisions. d) Ensure that it is clear how parties will be informed of outcomes. e) Provide information about the publication of sanctions including interim orders (this could be included in the complaints document or in sanctions guidance). f) Be clear on the process for issuing and lifting interim orders.	Standard 11
9	a) The NCIP should develop and publish indicative sanctions guidance and a publication policy for complaints outcomes b) The NCIP must publish details of any sanctions applied to registrants. These should remain online for at least the period of the sanction. There should be a clear rationale for the length of time that removal from the register is published for.	Standard 11
10	The NCIP should develop and document its processes for handling safeguarding concerns and ensure these are clear to the public.	Standard 11
11	The NCIP should publish its process for handling complaints against the organisation	Standard 11

The NCIP supplied evidence of how it had responded to the Actions above. This was considered by the Accreditation Panel which reconvened on 13 September 2023. The Accreditation Panel was not satisfied that the Actions had been fully addressed and therefore concluded that the Standards were not met. The Accreditation Panel considered whether the Standards could be met with Conditions and found that there remained fundamental gaps relating to our Standards for governance (Standard 7), education and training (Standard 9), Registration (Standard 10) and complaints handling (Standard 11). We also found that the nature of these gaps meant that Standards 2 (public protection) and Standard 5 (public confidence) were not met.

The Accreditation Panel found that the gaps against the Standards were too significant to be addressed through Conditions. The Accreditation Panel therefore decided that accreditation could not be granted at this time. Since we decided not to accredit the NCIP, the Accreditation Panel did not issue any Conditions or Recommendations. The following report provides detail supporting this outcome.

The Register

This section provides an overview of the NCIP and its register.

Date first Accredited	Initial Application
Type of Organisation	Community Interest Company, registered with Companies House as the Hypnotherapy and Psychotherapy CIC, (Company number 12466727), trading as the National Council of Integrative Psychotherapy (NCIP)
Overview of Governance	<p>The NCIP is overseen by the Board of the Hypnotherapy and Psychotherapy CIC. The day-to-day management of the NCIP is carried out by the Operations Team supported by the four teams:</p> <ol style="list-style-type: none"> 1) Training and Professional Standards 2) Assessment team 3) Ethics Committee 4) Complaints Committee 5) Media team <p>Alongside this sits the Management Advisory Board who advises the organisation.</p>
Overview of the aims of the register	<p>The strategic objectives of the register are published on the website:</p> <ul style="list-style-type: none"> • To protect the public, patients/clients and members. • To support the profession through our own standards. • To maintain, strengthen and enhance public confidence in the NCIP and the profession. • To uphold proper standards of conduct and behaviour of our members. • To maintain a strong relationship with Regulators and other aligned accredited registers. • To continuously develop competence in a highly skilled and diverse membership. • To maintain a skilled and motivated team to protect the public and support our members. • To seek continuous improvement in the good governance of the organisation. • To seek continuous improvement in the way we protect the public and support our members.
Register Website	https://www.the-ncip.org/home

<p>UK countries in which Register operates</p>	<p>The NCIP register operates in England, Scotland, Wales and Northern Ireland. At the time of the initial Accreditation Panel, we noted that there were registrants based in Singapore on the register. However, NCIP confirmed these had been removed from the register by the time of the reconvened Panel.</p>
<p>Role(s) covered</p>	<p>The NCIP holds a register of Integrative Psychotherapists. The NCIP state that all registrants are psychotherapists who use a range of modalities within their practice making them multi-disciplinary practitioners. The NCIP have noted the following as the main modalities:</p> <ul style="list-style-type: none"> • ‘Psychoanalysis • ACT [Acceptance Commitment Therapy] • CBASP [Cognitive Behavioural Analysis System of Psychotherapy] • DBT [Dialectical Behaviour Therapy] • RO-DBT [Radically Open Dialectical Behaviour Therapy] • MBSR [Mindfulness Based Stress Reduction] • MBCT [Mindfulness Based Cognitive Therapy] • Mindfulness • Equine assisted psychotherapy • Psychotherapy • Health Coaching • Coaching and Psychotherapy combined e.g., psychoeducation • Counselling including couples, chair work, adolescent, and children • NLP [Neuro-linguistic programming] • EMDR & related eye movement psychotherapies e.g., Flash, mindspotting • Mind Body psychotherapy including BPT and somatic. • Hypnotherapy including CBH [Cognitive Behavioural Hypnotherapy], Hypnobirthing, Clinical • Condition informed psychotherapy including trauma informed and clinical.
<p>Number of registrants</p>	<p>The NCIP reported that it has 800 full members on its register (as of August 2023).</p>
<p>Main practice settings</p>	<p>The majority of NCIP registrants will work in private practice, NCIP note that some registrants will work in the voluntary sector and may work in other settings such as schools and local authorities if they have a dual role.</p>

About the patients and service users	Service users could include people from across the population including children, those with long term health concerns and people from different ethnic backgrounds.
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Inherent risks of the practice

This section uses the criteria developed as part of the Authority's *Right Touch Assurance tool*³ to give an overview of the work of integrative psychotherapists.

Risk criteria	Integrative Psychotherapy
<p>1. Scale of risk associated with Integrative Psychotherapy</p> <p><i>a. What do Integrative Psychotherapists do?</i></p> <p><i>b. How many Integrative Psychotherapists are there?</i></p> <p><i>c. Where Integrative Psychotherapists work?</i></p> <p><i>d. Size of actual/potential service user group</i></p>	<p>a) The NCIP holds a register of Integrative Psychotherapists. The NCIP state that all registrants are psychotherapists who use a range of modalities within their practice making them multi-disciplinary practitioners. The different modalities are set out in the table above.</p> <p>b) The NCIP reported that it has 800 full members on its register (as of August 2023).</p> <p>c) Registrants work in England, Scotland, Northern Ireland and Wales predominantly in private clinics. NCIP note that some registrants will work in the voluntary sector and may work in other settings such as schools and local authorities if they have a dual role.</p> <p>d) It is estimated that 1 in 6 people a week experience a common mental health problem⁴. 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 2017⁵.</p>

³ 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.

⁴

https://webarchive.nationalarchives.gov.uk/ukgwa/20171010183932tf_/http://content.digital.nhs.uk/catalogue/PUB21748/apms-2014-full-rpt.pdf

⁵ <https://digital.nhs.uk/data-and-information/publications/statistical/mental-health-of-children-and-young-people-in-england>

<p>2. Means of assurance</p>	<p>Those registrants who are employed or working in the voluntary sector are likely to be subject to employer checks such as criminal records checks. As the majority of NCIP's registrants work in private practice, they will not be subject to these checks.</p>
<p>3. About the sector in which Integrative Psychotherapists operate</p>	<p>As noted, the majority of NCIP's registrants work in private practice and in the voluntary sector. There is the possibility that some will also work in schools and other education settings. The NCIP note that it is unlikely that its registrants will work within the NHS or local authorities unless they have a dual role.</p>
<p>4. Risk perception</p> <ul style="list-style-type: none"> • <i>Need for public confidence in Integrative Psychotherapists?</i> • <i>Need for assurance for employers or other stakeholders?</i> 	<p>As many 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 by integrative psychotherapists, 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>

Assessment against the Standards

Standard 1 – Eligibility and public interest

Summary

We found that Standard One could be met with Conditions. If accredited the Accreditation Panel would have found that the Standard was met with the following Conditions:

1. The NCIP should ensure that the remit of accreditation under the programme is clear to its registrants and the public. The AR quality mark should only be used by those working within the UK. The NCIP should provide clear guidance to its registrants on the use of the AR Quality Mark.
2. The NCIP should document its procedure for deciding whether an approach or modality is acceptable for inclusion on its register. This should include information on the decision makers and the criteria used to make the decision.
3. The NCIP should document its process for carrying out its website checks. This should include information about how many checks are carried out and when, who is responsible for the checks, providing any advice and following up. The NCIP should provide clear information to its registrants about the potential outcomes of non-compliance.
4. The NCIP indicated that it had updated its process for carrying out register checks. The NCIP is to provide evidence to the team of the checks that have been carried out and any actions taken.

The Accreditation Panel's findings

Accreditation Panel meeting 9 December 2022

The PSA's powers of accreditation are set out in the National Health Service Reform and Health Care Professions Act 2002⁶. Standard 1a considers whether a Register is eligible for accreditation, based on whether the role(s) it registers can be considered to provide health and care services and are not required by law to be registered with a statutory body to practise in the UK.

The NCIP holds a register of integrative psychotherapists. These registrants are all psychotherapists who use a range of modalities in their practice, therefore using a multi-disciplinary and integrative approach with service users. The NCIP defines psychotherapy as 'healing the mind with talking therapy.' The NCIP considers counselling, hypnotherapy and coaching to be modalities of psychotherapy.

We considered coaching and whether this fell under the definition of health as described by the Act, since we are aware it can also be used in professional settings. We found that while there was evidence that coaching can be used in a health setting, it is important that organisations that include coaching as part of their accreditation are clear that coaching used in other settings such as professional development or business settings do not come under the remit of the programme.

⁶ [National Health Service Reform and Health Care Professions Act 2002 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

We found that since the roles of NCIP registrants fall under the remit of health and care, and registrants are not required by law to be registered to practise within the UK that Standard 1a could be met with Conditions.

We recognised that the evidence base for integrative psychotherapy is still growing and that there is more evidence for some modalities than for others. However, there is some evidence that people can derive benefit from this approach to psychotherapy. We considered the risks identified by the NCIP and noted that due to the nature of integrative psychotherapy and the use of different types of therapeutic approaches by registrants, there were specific risks around advertising and the use of adjunctive therapies that would need to be addressed. We found that Standard 1b could be met with Conditions.

Accreditation Panel meeting 13 September 2023

The Accreditation Panel confirmed that this Standard could be met with Conditions.

Standard 2: the organisation demonstrates that it is committed to protecting the public and promoting public confidence in the occupation it registers.

Summary

When the Accreditation Panel initially met on 9 December 2022, it found that Standard 2 was not met due to the lack of independent oversight of key functions and the potential impact of the complaints process on public protection. The Accreditation Panel issued the following Actions that specifically relate to this Standard:

- **Action One** - The NCIP should ensure that its governance and oversight arrangements are clear and transparent to the public. This should include information about its governance arrangements, including how the company is run, how decisions are made within each of its functions, where financial decisions are taken and what checks and balances there are for individual decisions affecting the Register.
- **Action Two** - The NCIP should review, update, and publish the terms of reference for its Committees and Management Advisory Board to ensure that they set out their roles and responsibilities in a way that is clear and transparent for the public.
- **Action Three** - The NCIP should be clear about its oversight arrangements it has in place to ensure the fairness and consistency of decisions made about registration, complaints and education and training.
- **Action Four** - The NCIP should develop independent verification or quality assurance mechanisms for its education and training decisions.
- **Action Seven** - Decision making about complaints should be separate from governance Boards, Committees, and the Chief Executive (or 7 equivalent). Decision makers at different stages of the process including appeals should not have been previously involved in the complaint. The NCIP should review its process to ensure that there is separation between the investigations, adjudication, and appeals stages.

The Accreditation Panel also noted that the remaining Actions discussed under Standards 9, 10 and 11 would also be relevant to the assessment of this Standard.

When the Accreditation Panel reconvened on 13 September 2023 it found that the NCIP had not fully addressed the Actions required, such as updating its complaints processes and introducing independent oversight into its decision making.

The Accreditation Panel's findings

Accreditation Panel meeting 9 December 2022

The NCIP highlights its public protection role through its mission statement and strategic objectives. Registrants are expected to meet the NCIP's education and training standards, abide by its *Code of Ethics and Professional Practice* and are held to account through its complaints procedure.

We reviewed the NCIP's governance arrangements and noted that at the time, the day-to-day management of the organisation was under the remit of the Operations Team. There were four committees each with a specific area of responsibility. Two of these committees included lay representation. All the committees reported to the Operations Team. The NCIP had recently introduced a Management Advisory Board (MAB) which also included a lay person. The MAB did not however have any oversight responsibilities and therefore we found that there was not sufficient separation of functions and enough of a firewall between those making registration decisions and those making decisions about the sustainability of the organisation.

We noted that the Complaints Committee consisted of four people, one of whom was lay and was responsible for handling complaints. Complaints outcomes were decided by the Complaints Committee with input from the Risk Assessment Director who also sat on the Operations Team. The Accreditation Panel found that this did not provide enough separation as management of the NCIP were effectively ratifying the decisions of the Complaints Committee. The NCIP confirmed that complaints were considered by two people from the Complaints Committee, one professional and one lay but it wasn't clear how the NCIP separated the different stages of the process such as investigation, adjudication and appeals.

Accreditation Panel meeting 13 September 2023

We considered the NCIP's response to the Actions provided at the initial meeting. Further details are provided under Standards 7, 9, 10 and 11 below. The Accreditation Panel found that as the Actions had not been fully implemented that this Standard was not met.

Standard 3: risk management

Summary

We found that this Standard was met.

The Accreditation Panel's findings

Accreditation Panel meeting 9 December 2022

We reviewed the risk matrix and compared it to matrices provided by other talking therapy registers. We noted that broadly speaking the register included similar risks to those identified by others.

We noted that the risk matrix is comprehensive but that its length might make the review of risks difficult to manage. However, we recognised that it is being used by

the NCIP to monitor risks and that, should NCIP be successful, the Accreditation team would review the NCIP's management of risks as part of its ongoing reviews.

Accreditation Panel meeting 13 September 2023

The Accreditation Panel confirmed that this Standard was met.

Standard 4: the organisation demonstrates that it has sufficient finance to enable it to fulfil its voluntary register functions effectively including setting standards, education, registration, complaints and removal from the register

Summary

We found that this Standard was met.

The Accreditation Panel's findings

Accreditation Panel meeting 9 December 2022

We found that the NCIP has sufficient funding to enable it to fulfil its voluntary register functions effectively and therefore this Standard was met.

Accreditation Panel meeting 13 September 2023

The Accreditation Panel confirmed that this Standard was met.

Standard 5: the organisation demonstrates that it has the capacity to inspire confidence in its ability to manage the register effectively

Summary

When the Accreditation Panel initially met on 9 December 2022, it found that this Standard was not met due to the lack of independent oversight of key functions raising questions about the NCIP's ability to inspire confidence and manage the register effectively. The Accreditation Panel issued the following Actions that specifically relate to this Standard:

- **Action One** - The NCIP should ensure that its governance and oversight arrangements are clear and transparent to the public. This should include information about its governance arrangements, including how the company is run, how decisions are made within each of its functions, where financial decisions are taken and what checks and balances there are for individual decisions affecting the Register.
- **Action Two** - The NCIP should review, update, and publish the terms of reference for its Committees and Management Advisory Board to ensure that they set out their roles and responsibilities in a way that is clear and transparent for the public.
- **Action Three** - The NCIP should be clear about its oversight arrangements it has in place to ensure the fairness and consistency of decisions made about registration, complaints and education and training.
- **Action Four** - The NCIP should develop independent verification or quality assurance mechanisms for its education and training decisions.

- **Action Seven** - Decision making about complaints should be separate from governance Boards, Committees, and the Chief Executive (or 7 equivalent). Decision makers at different stages of the process including appeals should not have been previously involved in the complaint. The NCIP should review its process to ensure that there is separation between the investigations, adjudication, and appeals stages.

The Accreditation Panel also noted that the remaining Actions discussed under Standards 9, 10 and 11 would also be relevant to the assessment of this Standard.

When the Accreditation Panel reconvened on 13 September 2023 it found that the NCIP had not fully addressed the Actions required to introduce independent oversight into its decision making.

The Accreditation Panel's findings

Accreditation Panel meeting 9 December 2022

We reviewed the NCIP's *Conflicts of Interest Policy* and noted the NCIP's plans for this to be re-written. We determined that it is important for NCIP to be clear to the public about how it manages conflicts of interest and that it should consider publishing the revised policy on its website. This was particularly important given that the NCIP has a regulatory function but also a commercial interest in maintaining its membership. We noted that other improvements could be made to the NCIP's transparency such as publishing meeting minutes (or relevant extracts as related to its public protection) and being clearer about its governance structures and its decision making.

We also considered the NCIP's business continuity and succession plans and noted that it is important for organisations to have documented business continuity and catastrophe plans in place. These, particularly for smaller organisations, should include appropriate succession plans in place for key roles.

The Accreditation Panel noted that there was potential for conflicts of interest by members of the Operations Team being involved in registration decisions when they were also responsible for the financial sustainability of the organisation. We found that there wasn't enough separation of these functions and with no independent oversight.

Accreditation Panel meeting 13 September 2023

We considered the NCIP's response to the Actions provided at the initial meeting. Further details are provided under Standards 7, 9, 10 and 11 below. The Accreditation Panel noted the changes the NCIP had put into place to its governance structures, with the creation of a Board of Directors who were responsible for financial sustainability of the organisation. However, we noted that the NCIP had removed the Operations Director from making registration decisions and being involved in the Complaints process, however the introduction of the Board did not solve the potential conflict of interest between maintaining high standards and financial gain due to the Registrar being a Board Director and still making decisions about registration. We reviewed the roles and responsibilities of the MAB and noted that its primary function was to advise the NCIP and that it did not have a stated oversight role. The Accreditation Panel therefore found that there were not sufficient firewalls in place and that the NCIP did not have enough independent oversight and therefore accountability of key functions such as registration, education and training

and complaints handling. The Accreditation Panel found that as the Actions had not been fully considered that this Standard was not met.

Standard 6: the organisation demonstrates that there is a defined knowledge base underpinning the health and social care occupations covered by its register or, alternatively, how it is actively developing one. The organisation makes the defined knowledge base or its development explicit to the public

Summary

We found that this Standard was met.

The Accreditation Panel's findings

Accreditation Panel meeting 9 December 2022

We considered the NCIP's research page on its website which it uses to provide information to the public on the therapies offered by its practitioners. We found that this page could be improved by providing more information and evidence about integrative psychotherapy. Where evidence is limited, this should also be noted. This will help members of the public to make informed decisions about their care.

Accreditation Panel meeting 13 September 2023

The Accreditation Panel confirmed that this Standard was met.

Standard 7: Governance

Summary

When the Accreditation Panel initially met on 9 December 2022, it found that this Standard was not met as the governance arrangements were not clear and there was a lack of independent oversight of key functions. The Accreditation Panel issued the following Actions that specifically relate to this Standard:

- **Action One** - The NCIP should ensure that its governance and oversight arrangements are clear and transparent to the public. This should include information about its governance arrangements, including how the company is run, how decisions are made within each of its functions, where financial decisions are taken and what checks and balances there are for individual decisions affecting the Register.
- **Action Two** - The NCIP should review, update, and publish the terms of reference for its Committees and Management Advisory Board to ensure that they set out their roles and responsibilities in a way that is clear and transparent for the public.
- **Action Three** - The NCIP should be clear about its oversight arrangements it has in place to ensure the fairness and consistency of decisions made about registration, complaints and education and training.
- **Action Four** - The NCIP should develop independent verification or quality assurance mechanisms for its education and training decisions.
- **Action Seven** - Decision making about complaints should be separate from governance Boards, Committees, and the Chief Executive (or 7 equivalent).

Decision makers at different stages of the process including appeals should not have been previously involved in the complaint. The NCIP should review its process to ensure that there is separation between the investigations, adjudication, and appeals stages.

When the Accreditation Panel reconvened on 13 September 2023 it found that the NCIP had not fully addressed the Actions issued for Standard 7 to address this. We therefore found that this Standard was not met.

If accredited, the Accreditation Panel would have issued the following Condition:

5. The NCIP should ensure that all members of its Operations team, committees, and the Management Advisory Board are equipped to make fair, consistent, and transparent decisions. The NCIP should consider mechanisms such as appraisals for monitoring ongoing competence and consider induction training and ongoing training in areas such as equality, diversity and inclusion, data handling and decision making in disciplinary procedures for key decision makers.

The Accreditation Panel's findings

Accreditation Panel meeting 9 December 2022

We considered the information provided on the NCIP's website and found that it was not clear about the governance of the NCIP. We determined that the NCIP should set out clear information about how the organisation is run, how decisions are made and whether there is any oversight of decisions about registration, complaints and education and training.

The Accreditation Panel found that it was not clear what function the MAB served and what the reporting lines were between the different committees and the management structures. The Terms of Reference for the different groups were not clear and in some cases were missing key information about committees such as members and Chair, their role, frequency of meetings, reporting lines and how they will ensure Equality, Diversity and Inclusion is considered. The NCIP should consider what information should be included within its Terms of Reference and other governance documentation.

Accreditation Panel meeting 13 September 2023

We considered the NCIP's responses to Actions One to Three, and Seven. The Accreditation Panel also noted that that Action Four discussed under Standard Nine would be relevant to this Standard.

The Accreditation Panel noted the changes the NCIP had made to its governance structures and the updates it had made to the information it provides online. We noted the publication of the Role Descriptions for key roles and committees which were published in place of Terms of Reference, and therefore found that Action Two had been considered.

We found that despite this, it was still not clear what the role of the MAB was, what the relationship of the Board was to the rest of the organisation and where the oversight and accountability lay. We therefore found that Action One had only been partially considered.

It is important that there is a clear separation of functions and enough of a firewall between those making registration decisions (including complaints) and those making decisions about the sustainability of the organisation. The Accreditation Panel considered that there was still a potential conflict of interest between maintaining high standards and financial sustainability due to the Registrar being a Board Director. This is accentuated by the lack of appropriate mitigations such as independent oversight and key processes such as a registration appeals policy. We therefore found that there was not enough separation between the functions and that Action three had not been considered.

We found that the Actions had not been fully considered and therefore, that this Standard was not met.

Standard 8: setting standards for registrants

Summary

We found that this Standard was met.

The Accreditation Panel's findings

Accreditation Panel meeting 9 December 2022

We considered the *Code of Ethics and Professional Practice* and found that it had clauses covering personal behaviour, competence, and business practice. The Code whilst containing relevant clauses appeared to have been updated in an iterative way which means that it could be confusing to registrants and the public. The *Code of Ethics and Professional Practice* has clauses covering the principles behind the professional Duty of Candour, but it doesn't specifically mention it, and it isn't clear that registrants would be expected to provide information to service users about complaints.

The Accreditation Panel noted that whilst it found that the Standard was met, the *Code of Ethics and Professional Practice* would benefit from a review to ensure that the requirements were clear to the NCIP's registrants and members of the public. If accredited, a Condition would have been issued to address this.

Accreditation Panel meeting 13 September 2023

The Accreditation Panel confirmed that this Standard would have been met with a Condition, if accredited.

Standard 9: education and training

Summary

When the Accreditation Panel initially met on 9 December 2022, it found that this Standard was not met as the course assessment processes were not clear and there was a lack of independent verification of decisions or other quality assurance mechanisms in place for ensuring that the NCIP's decisions about training courses are fair and consistent. The Accreditation Panel issued the following Actions that specifically relate to this Standard:

- **Action Four** - The NCIP should develop independent verification or quality assurance mechanisms for its education and training decisions.

- **Action Five** - The NCIP should set out how it documents its assessment processes for education and training courses. This should include information on the assessment, renewals and how the NCIP will handle concerns.

When the Accreditation Panel reconvened on 13 September 2023 it found that the NCIP had not fully addressed the Actions required and this Standard was not met.

The Accreditation Panel's findings

Accreditation Panel meeting 9 December 2022

We found that the decision-making process wasn't clear. There didn't appear to be any independent verification of decisions or other form of quality assurance mechanisms in place for ensuring that the NCIP's decisions about training courses are fair and consistent.

We also found that the NCIP's processes for assessing courses was not clear. We noted that the NCIP needed to publish information about its standards for assessing education and training courses, as well as the processes it uses for initial assessment and renewals. During the initial assessment the NCIP highlighted an incident where it had become aware of a course that was no longer meeting its standards. We found that the NCIP's processes were not clear about what the NCIP will do if it has concerns that a course may no longer be meeting its requirements both in terms of the course and how it will ensure that registrants who have completed the course are still suitable to be on its register. The Accreditation Panel noted the importance of the NCIP being transparent about its processes to ensure that they are clear to members of the public, registrants, and training organisations.

Accreditation Panel meeting 13 September 2023

We considered the NCIP's responses to Actions Four and Five. The Accreditation Panel also noted that the Actions discussed under Standard 7 would impact this Standard. The Accreditation Panel was not clear what the NCIP had put into place to develop independent verification or quality assurance mechanisms for its education and training decisions and therefore found that Action Four was not considered.

The NCIP publishes information about its processes for assessing courses on its website. The Accreditation Panel welcomed the work the NCIP had done to make its processes for assessing courses clearer to the public. However, we noted that the NCIP had not included information about how it would handle concerns about its accredited courses and therefore found that Action Five was partially considered.

We found that the Actions had not been fully considered and therefore, that this Standard was not met.

Standard 10: management of the register

Summary

When the Accreditation Panel initially met on 9 December 2022, it found that this Standard was not met due to the lack of an appeals policy for registration decisions. We also noted that the points raised under Standard 7, around the lack of independent oversight would also impact this Standard. The Accreditation Panel issued the following Action that specifically relate to this Standard:

- **Action Six** - The NCIP should develop and publish policies for registration appeals, and for restoration and readmission to the register.

When the Accreditation Panel reconvened on 13 September 2023 it found that the NCIP had not fully addressed the Actions required and therefore found that this Standard was not met.

If accredited, the Accreditation Panel would have issued the following Conditions:

6. The NCIP should review its register to ensure that all entries include Unique Identifiers (UID)s to help people distinguish between registrants.
7. The NCIP should review its published processes to ensure that the application and renewal processes are clear. This should include being clear about what an applicant with a level four qualification will need to evidence to demonstrate they meet the requirements of a level five qualification.

The Accreditation Panel's findings

Accreditation Panel meeting 9 December 2022

We reviewed the information on the website and the register and noted that although unique IDs are recorded on individual profiles, they are not on the register landing page and that there is nowhere to record sanctions. It is important that this information is on the register to allow people to make informed decisions about the practitioners they are choosing and the care they are receiving.

We considered the NCIP's processes for application and renewal and noted that they were not clear about how equivalence for those who had a level four qualification would be assessed. We also considered NCIP's continuing professional development (CPD) policies and noted that it wasn't clear how the NCIP checks registrant's compliance with its CPD requirements.

We noted that the NCIP did not have an appeals policy for registration decisions or a restoration policy for readmitting people to the register. It is important for NCIP to have an appeals policy for registration decisions and a restoration policy in place so that these are clear and transparent to registrants and to members of the public.

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We considered the NCIP's responses to Action Six. The Accreditation Panel also noted that the Actions discussed under Standard 7 would impact this Standard. We noted that the NCIP had developed a restoration policy and that this was published within the indicative sanctions guidance on the website. The Accreditation Panel found that the policy was not clear. The NCIP had not provided any information on the process that a registrant would need to follow to be re-instated, and there didn't appear to be any consideration of factors such as criminality. It focused on restoration following disciplinary action, without considering other reasons for lapsing registration such as taking a career break.

The NCIP stated that its approach to registration meant that it did not need an appeals policy for registration decisions as it would work with the applicant until they were ready to apply. The Accreditation Panel did not agree with the NCIP's rationale and noted that there may be different reasons for refusing someone registration that were not linked to their competence and therefore it is important for the NCIP to have

an appeals process in place. We therefore found that this Action was partially considered.

We found that as the Action had not been fully considered this Standard was not met.

Standard 11: complaints and concerns handling

Summary

When the Accreditation Panel initially met on 9 December 2022, it found that this Standard was not met as there was no independent oversight of decision making. We noted that decisions appeared to involve members of the Management Team and there was a lack of independent oversight of the decisions which results in a potential conflict of interest. We found that there did not appear to be separation between decision makers at different parts of the process and that there were some significant gaps in the process which meant that the Standard was not met. The Accreditation Panel issued the following Actions that specifically relate to this Standard:

- **Action Seven** - Decision making about complaints should be separate from governance Boards, Committees, and the Chief Executive (or 7 equivalent). Decision makers at different stages of the process including appeals should not have been previously involved in the complaint. The NCIP should review its process to ensure that there is separation between the investigations, adjudication, and appeals stages.
- **Action Eight** - The NCIP should review, update, and publish its complaints handling procedures. The updated procedures should:
 - i. Give registrants the right to reply to any allegations and otherwise be Human Rights Act compliant in terms of fairness to registrants.
 - ii. Provide clear information on its criteria and process for decision making about how complaints progress. This should include how complaints are triaged, and the factors it considers in determining whether mediation is appropriate in individual cases.
 - iii. Make provision for hearings where facts are disputed and ensure that hearings panels are independent of the organisation and ensure that there are mechanisms to appeal decisions.
 - iv. Ensure that it is clear how parties will be informed of outcomes.
 - v. Provide information about the publication of sanctions including interim orders (this could be included in the complaints document or in sanctions guidance).
 - vi. Be clear on the process for issuing and lifting interim orders.
- **Action Nine** - The NCIP:
 - i. should develop and publish indicative sanctions guidance and a publication policy for complaints outcomes
 - ii. must publish details of any sanctions applied to registrants. These should remain online for at least the period of the sanction. There

should be a clear rationale for the length of time that removal from the register is published for.

- **Action Ten** - The NCIP should develop and document its processes for handling safeguarding concerns and ensure these are clear to the public.
- **Action Eleven** - The NCIP should publish its process for handling complaints against the organisation.

When the Accreditation Panel reconvened on 13 September 2023 it found that the NCIP had not fully addressed the Actions required and therefore this Standard was not met.

The Accreditation Panel's findings

Accreditation Panel meeting 9 December 2022

We considered the NCIP's published complaints process and noted that there were some significant gaps that would need to be addressed before the NCIP could be accredited. The process appeared to direct people towards mediation without any form of triage having been conducted to determine whether this was an appropriate route for the seriousness of the complaint.

Complaints processes must be fair to the registrant as well as the complainant and the process was not clear about what right of reply the registrants have to allegations. The Accreditation Panel felt that this could leave the NCIP open to legal challenge. The process did not set out clear processes for the publication of sanctions, the tests applied in determining sanctions and how they are issued and lifted. The Accreditation Panel noted that the NCIP did not receive many complaints but considered that nevertheless, an open and transparent complaints process is a fundamental requirement for an Accredited Register.

It is essential that there should be clarity about how decisions are made at each stage of the complaints process. We determined that the NCIP should be clear about the criteria it will apply (such as a 'realistic prospect' test or 'no case to answer') to make its decisions. It should provide the criteria and process used for escalating the status of a complaint from informal to formal and put provision in place for holding a hearing to ensure the fairness of the process when the facts of a case are disputed. We highlighted the importance of publishing sanctions to help the public make informed decisions. The Accreditation Panel also noted that the NCIP needed to put mechanisms in place to ensure that the process was fair and consistent such as indicative sanctions guidance.

We also highlighted the need for clear processes for handling interim orders and reviewed the NCIP's approach to safeguarding. It is important that the NCIP is clear about how it will handle a safeguarding concern if it becomes aware of one during the course of its duties and how it will manage registration for those cases that are being investigated where there is a potential public protection concern.

Accreditation Panel meeting 13 September 2023

We considered Actions Seven to Eleven. The Accreditation Panel also noted that the Actions discussed under Standard 7 would impact this Standard.

Although the NCIP had removed the involvement of the Operations Team in the adjudication of complaints and the issuing of sanctions, it had not separated out investigation and adjudication and the process still relied on other committees within

the NCIP to make a decision about sanctions. We therefore found that Action seven was not fully considered.

We recognised that the NCIP had done some work to update its procedures. The Accreditation Panel noted that the NCIP had added an independent appeal run by Centre for Effective Dispute Resolution (CEDR) to its complaints process. However, we found that the appeal process was not clear and that there appeared to be limited grounds for carrying out an appeal. We also noted that the recommendations of the appeal were not binding and therefore introduced a form of ratification by the Operations Team who were free to accept or reject the outcomes.

We noted that the NCIP had made some changes to the information on its website, however, we could not see evidence for all of the changes we had requested. It is not clear how the NCIP would issue or lift interim orders. It is important that registers have mechanisms in place to protect the public such as interim orders, in cases where there is a risk to the public. The NCIP processes did not appear to include a provision for holding hearings where facts were disputed and therefore, we found that the process was potentially unfair to the registrant. There was also a lack of clarity and transparency about the process that would be followed. We therefore found that Action Eight had not been considered.

We considered the NCIP's new indicative sanctions guidance. We found that some areas were still unclear, such as the length of time a sanction would be considered for and how long it would be published. There was also a concern that the guidance seemed to indicate that some sanctions would not be published such as interim orders which was not considered sufficient to protect the public. We therefore found that Action Nine was partially considered.

We reviewed the safeguarding policy. We found that this did not address how the NCIP itself would handle safeguarding concerns that it became aware of in carrying out its duties. We therefore found that Action Ten was not fully considered.

We reviewed the organisational complaints process. Although the Accreditation Panel felt that it could benefit from having been reviewed from a plain English perspective, it found that this Action had been fully considered.

We found that as the Actions had not been fully considered this Standard was not met.

Share your experience

We carried out a share your experience exercise between 8 April 2021 until 18 May 2021. We received 25 responses, 20 from NCIP members, three from individuals, two from external organisations. Twenty-one responses were supportive, 18 of which were from members and three from other individuals. Four raised concerns covering several of the Standards. The concerns raised have been addressed through the assessment.

The main themes of the concerns were:

1. The independence of the complaints process and the lack of provision made for those who might wish to complain about members of the Senior Management Team; the level of confidentiality shown to complainants and the thoroughness of investigations carried out.

2. The setting and monitoring of professional standards for registrants in areas such as safeguarding, professional boundaries and advertising.
3. Communication about what the scope of the Register in terms of therapeutic practice and age ranges registrants work with.
4. Concerns regarding the NCIP's accreditation processes for training programmes with one respondent concerned that trainers were not appropriately trained or experienced leading to poor standards of registration.
5. Another concern raised was specifically about the NCIP's decision to cease its accreditation of the Rapid Transformational Therapy course that has been communicated to members and the general public.

Impact assessment (including Equalities impact)

We carried out an impact assessment [\[add link to impact assessment when published\]](#) as part of our decision to not accredit the NCIP. This impact assessment included an equalities impact assessment as part of the consideration of our duty under the Equality Act 2010.

The Accreditation Panel decided not to accredit the NCIP. The Accreditation Panel was not satisfied that the Actions that had been issued at the NCIP's initial Accredited Panel meeting had been fully addressed and therefore concluded that the Standards were not met. The Accreditation Panel considered whether the Standards could be met with Conditions and found that there remained fundamental gaps relating to our Standards for governance (Standard 7), education and training (Standard 9), Registration (Standard 10) and complaints handling (Standard 11). We also found that the nature of these gaps meant that Standards 2 (public protection) and Standard 5 (public confidence) were not met. The Accreditation Panel found that the gaps against the Standards were too significant to be addressed through Conditions.

We considered whether there were any negative impacts on service users and employers of our decision to not accredit the NCIP. We considered how this might affect the current challenges in accessing mental health practitioners in the UK. Although accrediting the NCIP would have widened the pool of Accredited Register practitioners, this must be balanced by the need to protect the public and ensure confidence in the programme by making sure that only organisations that demonstrate our Standards for Accredited Registers gain accreditation. It is important that our Accreditation Quality Mark gives confidence in the confidence of practitioners who are permitted to display it. The gaps highlighted in this report for key functions such as registration, education and training and complaints handling mean that we can't say that the NCIP has robust processes in place and is able to demonstrate that its practitioners meet high standards of competency and appropriate behaviours.

We found that the complaints process would not provide a fair, proportionate and transparent route of redress if things went wrong. The process is not accessible and due to the lack of information about the practitioners right to reply to allegations and dispute the facts of the case, it is not fair to all parties.