

Accredited Registers Impact Assessment

Accredited Register: Association of Christians in Counselling and Linked Professions (ACC)

Type of Review: Full Renewal Assessment

Period under review: 2021-2024

Date Approved for Panel: 26 June 2024

Introduction

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

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

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

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

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

Impacts

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Equalities impacts – summary

- The ACC does not collect information about age of their registrants or their service users, and notes they have no information arising from their register which could contribute to arguments about the benefit or counselling and psychotherapy for specific groups.
- ACC registrants work in many different settings and with a wide range of clients from different groups, age ranges and demographics.

Impacts on groups with protected characteristics

Age

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

Disability

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

Gender reassignment

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

Marriage and civil partnership

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

Pregnancy and maternity

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

Race

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

Religion or belief

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Positive		<p>The ACC advised “one of the primary purposes of our register is to provide a register of counsellors who profess a religious faith for the benefit of clients who for whatever reason have a preference for a counsellor who has a religious faith.</p> <p>We have gathered feedback from a service that ACC have managed, delivered by our registrants, and funded (in 2021-22) by the NHS. This provides some evidence of the value clients place on having counselling and especially on having a Christian counsellor.”</p>		

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Sex

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

Sexual orientation

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral		The ACC is a signatory of the MoU on Conversion Therapy.		

Cost and market impacts – summary

- Registration currently costs £159 and the most common fee in private practice is £45 per session. There is a large variation between how many service users a registrant may typically see in one week (from 2-3 to 25 per week).
- The ACC noted that they do not consider that the costs of accreditation will result in the need to pass costs directly on to registrants and from them, to service users.

Social and environmental impacts – summary

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

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Decision

The Accreditation Panel decided overall, it is in the public interest to re-accredit the ACC.