

## Accredited Registers Impact Assessment

Accredited Register: British Psychological Society (BPS)

Type of Review: Initial

Period under review: N/A

Date Approved for Panel: 16 March 2022

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### 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

#### Equalities impacts – summary

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The BPS has not historically collected data about protected characteristics from its registrants. However, from March 2022 their new database will allow registrants to input personal characteristics if they wish too. The BPS expects to have a set of data by the end of 2022. The BPS highlighted a report which it commissioned in 2021.<sup>1</sup> This report was published by the Nuffield Trust and considered the size and demographic of the psychological workforce. The report highlighted a number of barriers to becoming a psychologist, including race, disability and socio-economic background. The report found that some minority groups are less likely to progress in a psychology career within the NHS compared to others, that disabled undergraduate students are more likely to drop out of their psychology course and that men are less likely to pursue a career in psychology.

The BPS noted that it is currently exploring some of these points further, for example it is 'exploring decolonising of the curriculum and research during 2022 and 2023.' However, the BPS feels that embedding the standards, building recognition of the roles, and ensuring the career pathways are clear will help encourage people from all backgrounds into training for these roles.

The BPS is a signatory of the *Memorandum of Understanding on Conversion Therapy*<sup>2</sup> which has been signed by 25 psychology, counselling, therapy and allied organisations and states that 'Organisations with practice members will ensure through training and/or published guidelines that the relevant over-arching ethical principles in their statements of ethical practice are understood and applied when working with sexually and gender diverse clients, as pertaining to the basic standards of honest, competent and non-discriminatory practice to which clients of all identities and orientations are entitled.'

The BPS has an EDI Strategic Board whose terms of reference are published on the website.<sup>3</sup> The BPS reported that it will be developing a permanent EDI group which will be a standing committee of the Board of Trustees and will be responsible for overseeing EDI across the organisation.

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<sup>1</sup> <https://www.nuffieldtrust.org.uk/research/the-right-track-participation-and-progression-in-psychology-career-paths>

<sup>2</sup> <https://www.bps.org.uk/guideline/memorandum-understanding-conversion-therapy-uk>

<sup>3</sup> <https://www.bps.org.uk/diversity-and-inclusion>

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**Impacts on groups with protected characteristics**

*Age*

Type of impact	Group(s) affected	Description	Actions required	Date identified
Positive	Young People	Registrants will work with people at all ages including children and young people. The BPS has highlighted that all registrants will be required to have criminal record checks check as part of their employment requirements.	Following the completion of the Authority's pilot on DBS checks, we will update the registers on any new requirements. This may result in registers needing to make changes.	21 July 2022
Positive	Young people	Two of these roles work specifically with children (CWP and EMHP)'s bringing these roles under the Accredited Registers programme provides further assurance to service users and employers.	No action required	21 July 2022

*Disability*

Type of impact	Group(s) affected	Description	Actions required	Date identified
Positive	Those requiring low intensity mental health	These roles form part of the wider mental health workforce in the UK. The roles allow low intensity interventions to be tried and care to be stepped up if needed. Bringing these roles under the Accredited Registers	No action required	21 July 2022

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		programme provides further assurance to service users and employers.		
Positive		The Nuffield Trust report highlighted disability as a potential barrier to becoming a psychologist, noting that Disabled undergraduate students are more likely to drop out of their psychology course	The BPS noted that embedding the standards, building recognition of the roles, and ensuring the career pathways are clear will help encourage people from all backgrounds into training for these roles.	21 July 2022

### Gender reassignment

Type of impact	Group(s) affected	Description	Actions required	Date identified
Neutral		The BPS is a signatory of The <a href="#">Memorandum of Understanding on Conversion Therapy (MOU)</a> . Signed by 25 psychology, counselling, therapy and allied organisations.	No Action required	21 July 2022

### Race

Type of impact	Group(s) affected	Description	Actions required	Date identified
Positive	Black and Asian people	The BPS highlighted that there are barriers to progression for many Black and Asian people in psychological study and progression. Many of these potential barriers were highlighted in the <a href="#">Nuffield Report 2021</a> .	The BPS is currently exploring new work around the pipeline into psychology for those from ethnically diverse backgrounds. In line with this report BPS has committed to an extensive work	21 July 2022

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			programme exploring Decolonising of the Curriculum and Research during 2022 and 2023. By further embedding professional standards across allied psychological professions this work will have more impact in dovetailing with learning and standards across BPS registered professions.	
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### Sex

Type of impact	Group(s) affected	Description	Actions required	Date identified
Positive	Male	The BPS stated that there are several barriers currently under investigation in relation to sex, noting the number of men studying and completing psychology at undergraduate level.	The BPS states that it is carrying out further work in this area in 2022.	21 July 2022

### Sexual orientation

Type of impact	Group(s) affected	Description	Actions required	Date identified
Positive		The BPS is a signatory of The Memorandum of Understanding on Conversion Therapy (MOU). Signed	No Action required	21 July 2022

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		by 25 psychology, counselling, therapy and allied organisations.		
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### Cost and market impacts – summary

All those within these roles, must be in suitable employment to be registered. People in these roles will not be self-employed and therefore don't charge for their services so there is unlikely to be a cost impact to service users. The BPS has set the current fees at £111 for those who apply at the Graduate level and £94 for those who apply at the Associate level. The BPS told us that they have no plans to increase the registration fee following accreditation as they recognise the salary level of these roles is lower than many others who are required to pay professional registration fees.

Registration with either the BPS or the British Association of Behavioural and Cognitive Psychotherapies (BABCP) will be a requirement for PWP's employed by NHS England & Improvement (NHSE&I), this could result in increased costs for those PWP's who are not currently registered. This requirement could also mean that any registrants who are removed from the register through the BPS' complaints procedures or through processes such as its CPD audit could find themselves unemployed. As a result, it is important that the BPS has robust procedures in place. This requirement however has been introduced by NHSE&I and is thought necessary to protect the public and will ultimately drive up standards in these roles. It is hoped that employers will start to add registration as a requirement for employment for the other roles going forward.

We have identified one other register who will be registering PWP's, CWP's and EMHP's, the BABCP. This organisation has also applied for accreditation. There is a possibility that registrants may decide to move between organisations. Registrants who are removed from the BPS for conduct issues will not be able to join the BABCP. The BPS and the BABCP have a data sharing agreement which will allow the two registers to share information about complaints and their outcomes. No other market impacts have been identified.

### Social and environmental impacts – summary

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Accreditation through the programme will provide employers with further reassurance that practitioners have met its registration standards including education and training.

### Decision

The Panel noted the actions above and considered the Conditions and Recommendations highlighted as part of the assessment. The Panel agreed with these actions. The Panel also noted that the BPS lay positions on the Register Advisory Panel and the Complaints Standing Committee were not paid, the Panel noted that this may hinder diversity on its Register Advisory Panel and the Complaints Standing Committee. The Panel noted that the BPS may want to consider its position on this going forward.