

Accredited Registers Notification of Change

National Counselling & Psychotherapy Society
(NCPS) and
National Hypnotherapy Society (HS)

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Contents

The Process	3
The Outcome.....	5
The Register	6
Assessment against the Standards	7
Share Your Experience	12
Impact assessment (including Equalities impact)	12

The Process

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).

Once accreditation has been granted, a register must tell us of any significant changes it has made or plans to make that may affect whether it meets our Standards. We consider these changes through our [Notification of Change](#) process. Not all changes will require a notification of change and in some cases, it will be sufficient to tell us about them at either at their annual check, or full renewal assessment.

Changes requiring a notification of change application are considered by an Accreditation Panel. The panel will decide whether to accept the change or not. The options available to the Panel are:

- Accept the change
- Accept the change, with Conditions and/or Recommendations
- Not accept the change at this time, with reasons specified
- Adjourn to request further information from the Register.

Notification of Change

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. This report refers to the NCPS' register only.

NCPS Registrants must hold a qualification in counselling or psychotherapy practice at Regulated Qualification Framework (RQF) Level 4 or equivalent. Registrants with advanced qualifications and experience may hold higher grades of registration.

The NCPS applied to extend its accreditation to a new specialist register, and sub-register:

1. Relationship Therapist (RT) register

'Relationship Therapists, sometimes known as Relationship or Couple Counsellors, work with clients to find a way through difficulties they may be facing in their intimate/personal relationship/s. They work primarily with adult couples, though may also see individuals, families, young people and children. The focus is on interpersonal as well as intrapersonal issues. Working with more than one client in the consulting room requires the ability to work with the dynamics of clients' relationship with each other. Issues of contracting and confidentiality may be more complex than with individual work. Practitioners need to have undergone specialist training.'

2. Psychosexual and Relationship Therapists (PT) sub-register

'Psychosexual and Relationship Therapists are Relationship Therapists who have undertaken further specialist training to equip them to work specifically with a range of sexual difficulties, both physiological and psychological, as well as relationship problems arising from sexual issues.'

The NCPS had originally applied to extend accreditation to a 'Psychosexual, Relationship and Couple Therapist (PRCT)' title and register. Following our initial assessment, including consideration of Share Your Experience (SYE) responses, the NCPS took time to further develop the registers. The NCPS resubmitted its application for RT and PT registers. The PT sub-register is for practitioners who meet the entry requirements for the RT register and who have also acquired a further specialist psychosexual qualification.

We considered the NCPS' Notification of Change applications under the previous [Standards for Accredited Registers - \(April 2016\)](#) which were in place when the Notification of Change was originally submitted.

The Outcome

We decided that the changes would not affect the NCPS' compliance with the Standards for Accredited Registers. Our Accreditation Panel approved the change following a review of evidence supplied by the NCPS and gathered by the Accreditation team.

We issued the NCPS the following Condition:

1. The NCPS must provide clear statements on its website(s) that the RT and PT practices performed by its registrants are strictly talk-based therapies that do not involve physical touch, are not intended for work with children and young people, and do not entail any medical procedures or examinations.

Statements must be prominently displayed on its website(s) within one month of the launch of the RT and PT registers¹.

We issued the NCPS the following Recommendations:

1. The NCPS should undertake further work to better understand and address risks and issues relating to RT and PT work across different cultural groups.
2. The NCPS should develop objective criteria and processes for assessment of previously unseen qualifications, portfolios or other subjective evidence, presented for admission to the RT and PT registers, to assure its assessments are fair, consistent and effective.

¹ The NCPS provided evidence of how it had addressed the Condition prior to publication of the report. Our findings are set out in paragraphs 3.9 – 3.11.

The Register

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

Name of Organisation	National Counselling and Psychotherapy Society (NCPS) The NCPS was known as the National Counselling Society (NCS) until 15 May 2023.
Website	https://nationalcounsellingsociety.org/
Type of Organisation	Private company limited by guarantee without share capital
Role(s) covered	Therapists, Psychologists, Counsellors, Psychotherapeutic Counsellors, Psychotherapists, Children and Young People Therapists (CYPTs), Person-Centred Experiential Therapists (PCETs)
Number of registrants	7,746 as of 1 January 2023.
Overview of Governance	<p>The NCPS is overseen 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 and Registrar, Head of Professional Standards, and five lay members.</p> <p>The NCPS has a Professional Standards Committee which ‘reviews and updates the Society’s internal processes and procedures where professional standards are concerned’, a Professional Conduct Committee which oversees concerns and complaints against registrants, and a Professional Development and Supervision Committee responsible for Continuing Professional Development (CPD) and supervision. The NCPS’ Independent Assessor ‘reviews and reports to the Chair and Chief Executive of the Society on matters of Society Audit and Governance.’</p>
Overview of the aims of the register	<p>The NCPS’ approach is set out on its website, including that:</p> <p>‘We support and promote counselling and counsellors, offering a wide variety of benefits to our members and training providers. We have also created and published online CPD courses to support healthcare providers and those in public-facing roles.’</p>

Assessment against the Standards

Standard 1: the organisation holds a voluntary register of people in health and/or social care occupations

- 1.1 NCPS registrants use different approaches, as set out on their [What are the different types of therapy?](#) webpage. Registrants may use unregulated occupational titles including 'counsellor' and 'psychotherapist'.
- 1.2 The NCPS' new registers for Relationship and Psychosexual Therapists is for existing registrants who have demonstrated meeting required competencies in these fields. The NCPS told us that many of its registrants already specialised in relationship issues and worked with organisations such as [Relate](#). The NCPS aimed to highlight those registrants' additional skills and training.
- 1.3 Relationship therapies typically involve two or more clients. The NCPS states that while sessions can be 'with individuals if the clients have come for relationship therapy ... it does not include work with a relationship focus where the contract is with only one client.'
- 1.4 At present, NCPS registrants can highlight that they provide relationship therapies on their register profiles. The NCPS told us that following launch of the RT and PT registers, registrants would have two years to join those registers if they wished to continue highlighting those therapies.
- 1.5 We considered that the work of RTs and PTs met the definition for working in a health care occupation set out in the National Health Service Reform and Health Care Professions Act 2002, section 25E (8) - 'Health care' includes: all forms of health care for individuals, whether relating to physical or mental health; and procedures that are similar to forms of medical or surgical care but are not provided in connection with a medical condition.'
- 1.6 We found that compliance with this Standard was not affected by the change.

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

- 2.1 The NCPS' register protects the public by maintaining standards of conduct and competence, enforced through its complaints procedures. Additionally, the NCPS requires its registrants, which will include RTs and PTs, to engage in CPD activities, maintain appropriate indemnity cover, and make necessary declarations regarding their good character and health.
- 2.2 The NCPS' Professional Standards subcommittee is responsible for identifying, monitoring, reviewing, and addressing risks associated with RT and PT practices.
- 2.3 The NCPS has published Entry Requirements and Training Standards² for the new registers, setting out that practitioners must, for example, 'acquire the skills to work with the dynamics of relationships, as well as common issues arising in couple therapy – such as desire, conflict, potential separation, lack

² <https://nationalcounsellingsociety.org/assets/uploads/docs/RTR-Training-Standards-Doc.pdf>

of relationship vision, communication blocks, non-consummation [and] endings.’

- 2.4 We noted that the RT and PT register could assure clients that therapists have suitable training and supervision, allowing them to safely work in areas with a potentially higher risk of harm through boundaries violations or other inappropriate practices.
- 2.5 An SYE response for the PRCT application stated that the NCPS’ ‘generalist’ approach did not promote confidence that it had the expert knowledge to operate a specialist register. The NCPS referred us to similar Accredited Registers that operated specialist registers and highlighted that it was developing RT and PT specific standards in collaboration with subject experts such as Relate.
- 2.6 We found that compliance with this Standard was not affected by the change.

Standard 3: Risks

- 3.1 The NCPS set out its understanding of risks presented within relationship and psychosexual therapies. These ranged from failure to maintain appropriate neutrality when working with more than one client, to risk of erotic transference within psychosexual therapy.
- 3.2 An SYE response to the PRCT application stated that risks relating to inappropriate physical contact with clients are higher in psychosexual therapy than other therapies. The NCPS stated that psychosexual therapy, within the scope of its register, is a talking-based treatment and does not involve any form of physical contact. The NCPS advised it will make this clear in its communications.
- 3.3 The SYE response also raised concerns that PRCT was assumed to include medical procedures requiring specific risk management procedures. The NCPS advised that medical procedures are outside the scope of its register and that it will ‘advise registrants that even if they are medically qualified to undertake physical examinations, they should refrain from doing so while in the role of RT and/or PT. They will be advised that a referral to another medical practitioner for this purpose should be arranged’.
- 3.4 The NCPS’ [What are the different types of therapy?](#) webpage had stated that relationship therapists may work with young people and children. We asked the NCPS how risks relating to these groups, including safeguarding, had been considered. The NCPS responded that the scope of its RT and PT registers applies to adults, and that it did not regard registrants as qualified to work with clients under the age of 18. The NCPS has amended that webpage accordingly.
- 3.5 We considered that it was essential for the NCPS’ positions on such risks to be explicitly clear to its registrants and to the public. We issued the NCPS with a Condition to address these.
- 3.6 The NCPS highlighted a risk relating to working with cultures where ‘discussion of sexual matters may be seen as inappropriately stimulating and even forbidden.’ The NCPS advised it would encourage trainers and supervisors to remain vigilant where this issue is concerned. We issued a

Recommendation for the NCPS to further consider how it could address this risk.

3.7 We found that compliance with this Standard was not affected by the change.

3.8 We issued the following Condition:

1. The NCPS must provide clear statements on its website(s) that the RT and PT practices performed by its registrants are strictly talk-based therapies that do not involve physical touch, are not intended for work with children and young people, and do not entail any medical procedures or examinations.

Statements must be prominently displayed on its website(s) within one month of the launch of the RT and PT registers.

3.9 Prior to publication of this report, the NCPS published the following within the descriptions of Relationship and Psychosexual Therapies on the [NCS | What are the different types of therapy? \(nationalcounsellingsociety.org\)](https://nationalcounsellingsociety.org) webpage:

‘NCPS registrants, when working with the specific modality of Psychosexual and Relationship Therapies only will do so with adult clients. Psychosexual and Relationship Therapies are strictly talk-based therapies that do not involve physical touch and do not entail any medical procedures or examinations.’

3.10 We found that the statement provided by the NCPS communicated the necessary information and was displayed in a suitable location on their register website.

3.11 We found that the Condition had been met. When the NCPS launches its new website we will check that presentation of information about the RT and PT registers conforms to the requirements of the Condition.

3.12 We issued the following Recommendation:

1. The NCPS should undertake further work to better understand and address risks relating to RT and PT work across different cultural groups.

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

4.1 The NCPS told us that RT and PT registrants would be charged an additional annual fee.

4.2 We found that compliance with this Standard was not affected by the change.

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

5.1 The NCPS formed a subcommittee of its Professional Standards Committee (PSC) for the RT and PT registers which includes subject experts.

5.2 An SYE response stated that the NCPS may not have sufficient expertise in the modality to run a PRCT register. The NCPS referred to its consultation with relevant training providers, subject experts and other resources when developing the RT and PT registers.

5.3 We found that compliance with this Standard was not affected by the change.

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

- 6.1 The NCPS highlighted the existing knowledge base for relationship and psychosexual therapies, include sources used and overseen by other Accredited Registers.
- 6.2 An SYE response stated that psychosexual, relationship and couples Therapies are distinct modalities that cannot be easily linked together. It stated that ‘psychosexual therapy’ is accepted as a ‘specialised profession that requires an in-depth knowledge of anatomy, physiology as well as pharmacology all of which need to be integrated into a medical model and applied into a psychotherapeutic frame.’
- 6.3 The NCPS responded, and directed us to the professional qualification requirements of other bodies³, in line with its view that ‘psychosexual therapy need not be integrated into a medical model and may be practised by counsellors and psychotherapists with appropriate specialist training. Such training will include some *knowledge* of the anatomy and physiology of sexual response and of pharmacology and its impact on sexual and emotional function. Many practitioners and stakeholders do not, however, take the view that an in-depth knowledge of anatomy, physiology and pharmacology is required.’
- 6.4 We found that compliance with this Standard was not affected by the change.

Standard 7: governance

- 7.1 The RT and PT subcommittee is composed of subject experts and chaired by the NCPS’ Head of Professional Standards. The subcommittee’s role is to validate previous applications to the register, review policy and procedures, and to consider complex applications.
- 7.2 An SYE response stated that it was not clear who was responsible for setting and maintaining standards within the NCPS. The NCPS told us that dedicated areas of its website would be developed to communicate information about new titles. We will assess how information on its new registers is communicated on its new website in due course.
- 7.3 The NCPS highlighted its engagement and partnership with relevant stakeholders within RT and PT, including the charity Relate and relevant training providers.
- 7.4 We found that compliance with this Standard was not affected by the change.

³ For example the [College of Sexual and Relationship Therapists \(COSRT\) Training Accreditation requirements](#).

Standard 8: setting standards for registrants

- 8.1 An SYE response stated that the NCPC had no specific clauses within its Code of Ethics addressing challenges within relationship and psychosexual therapies. We noted that the NCPS had since developed its additional [training standards](#) required for entry to the RT and PT registers. These include competencies regarding maintaining boundaries and responding appropriately to issues of risk including domestic abuse, mental health, and child protection.
- 8.2 We also noted that the NCPS was collaborating with Relate to produce a shared Competency Framework for Relationship Therapy
- 8.3 The NCPS told us that following introduction of the RT and PT title, practitioners on its original register would be able to advertise their work with these fields for a maximum of two years. Following this period, only RT and PT registrants would be allowed to do so.
- 8.4 We found that compliance with this Standard was not affected by the change.

Standard 9: education and training

- 9.1 The NCPS has developed [Relationship Therapist Register with Psychosexual Therapist Sub-Register Entry Requirements and Training Standards](#) setting out the competencies required for registrants to join the specialist registers.
- 9.2 We noted that registrants must be able to identify and refer complex cases (including serious mental health problems, sexual dysfunction, domestic abuse and safeguarding concerns) to specialists as required.
- 9.3 The NCPS currently requires a minimum of counselling or psychotherapy qualifications at the Ofqual Regulated Qualification Framework (RQF) Level 4 or an equivalent. To be eligible for registration on the RT and PT register, existing NCPS registrants must demonstrate competencies at RQF Level 5 or an equivalent level.
- 9.4 Applicants must present a recognised qualification, present a portfolio that includes some specialist training at the required Level 5 standard, or present other evidence for assessment by the NCPS.
- 9.5 In our evaluation, we observed that certain courses approved by the NCPS for registration appeared to be CPD or foundational courses. The NCPS emphasized that these courses provide in RT and PT competencies to practitioners who already possess the minimum required competencies for general registration. The NCPS advised that its list of recognized qualifications is the result of consultation with established therapy providers, and its Professional Standards Committee comprises experienced academics who could determine if a course meets the Level 5 requirements.
- 9.6 We noted that NCPS did not appear to have a documented process for assessing such applications so issued a Recommendation.
- 9.7 We found that compliance with this Standard was not affected by the change.
- 9.8 We issued the following Recommendation:
 2. The NCPS should develop objective criteria and processes for assessment of previously unseen qualifications, portfolios or other subjective evidence,

presented for admission to the register, to assure its assessments are fair, consistent and effective.

Standard 10: the register

- 10.1 RT and PT registrants will be required to display their register logos on their register website profiles. The public will be able to search for RT and PT registrants using register search functions.
- 10.2 The NCPS advised it is developing a new website that will allow for separate registers to be displayed.
- 10.3 We found that compliance with this Standard was not affected by the change.

Standard 11: complaints and concerns

- 11.1 RT and PT registrants will be subject to the same disciplinary processes as other NCPS registrants.
- 11.2 We found that compliance with this Standard was not affected by the change.

Share your experience

- 11.3 The NCPS had supplied four Notifications of Change together. We issued a combined Share Your Experience consultation for the four applications and received 22 responses.
- 11.4 Many responses made positive comments about the NCPS' PRCT application however one raised concerns. The submission stated that psychosexual and relationship/couples therapies should be considered separate fields. The sender was also concerned that the NCPS did not appear to have engaged with relevant stakeholders when developing its register.
- 11.5 We noted that the NCPS had considered this feedback and acted to address the issues raised. The register has been redesigned as the RT and PT registers. The NCPS has collaborated with, and received endorsement⁴ from, bodies such as Relate.

Impact assessment (including Equalities impact)

- 12.1 We noted and took account of the impact of our decision to approve the change.
- 12.2 We noted that the RT and PT register could help service users find a practitioner with appropriate training to help with relationship and psychosexual issues.
- 12.3 In line with previous decisions, we considered potential impact of the new registers for employers such as the NHS: A perceived risk was identified that (NHS) services may not recognise potential differences in the levels of training and competence held between practitioners belonging to different registers. We had previously noted that it is for employers and commissioners of services to determine the level of assurance required for a role.

⁴ <https://nationalcounsellingsociety.org/about-us/relationship-therapist-register-and-psychosexual-therapist-sub-register>

- 12.4 We had regard to our duty under the Equality Act 2010 when considering the notifications of change.
- 12.5 We considered the impact on clients, potentially including children and vulnerable adults, if risks were not properly mitigated. We noted how the NCPS' standards addressed such risks, and also issued a Condition for its scope of practice of RT and PT therapies to be made clear.
- 12.6 We noted that the NCPS' collaboration with groups such as Relate could help it to assure that risks impacting on protected groups are further mitigated. We noted that body's awareness of issues that may occur within inter-cultural relationships. We considered that the NCPS should conduct further work to assure that it is addressing cultural matters, for example in those where sexual matters may be perceived to be inappropriate, and issued a Recommendation.