

Accredited Registers Notification of Change

National Counselling Society (NCS) and
National Hypnotherapy Society (HS)

March 2022

Contents

Background	3
Outcome	4
Assessment against the Standards for Accredited Registers	6
Share your experience	101
Impact assessment.....	11
Equality duty under the Equality Act 2010	11

About the National Counselling Society (NCS) and National Hypnotherapy Society (HS)

The National Counselling Society and the National Hypnotherapy Society (the NCS and HS) hold two separate registers under a common governance system. They register:

- Counsellors
- Psychotherapists
- Hypnotherapists.

Its work includes:

- Setting and maintaining standards of practice and conduct
- Maintaining a register of qualified professionals
- Assuring the quality of education and training
- Requiring registrants to keep their skills up to date through continuing professional development
- Handling complaints and concerns raised against registrants and issuing sanctions where appropriate.

The NCS and HS were first accredited on 21 May 2013. As of January 2022, there were 7582 registrants on the NCS and HS registers.

Background

The Professional Standards Authority accredits registers of people working in a variety of health and social care occupations not regulated by law. To be accredited, organisations holding such registers must prove that they meet our demanding [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 Society \(NCS\)](#) operates an Accredited Register for counsellors and psychotherapists. The National Hypnotherapy Society operates an Accredited Register for hypnotherapists. They share a common governance system. This report refers to the NCS' register only.

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 NCS applied to extend its accreditation to two new register titles:

1. Children and Young People Therapists (CYPTs)

CYPTs work with children (4-10 years) and young people (11-18 years) using verbal counselling skills and other techniques, such as play therapy.

NCS registrants of any grade may already work with children and young people, according to its standards. The NCS intends the CYPT title provide further assurance that therapists are competent to work safely with these age groups.

2. Person-Centred Experiential Therapists (PCETs)

Person-Centred Experiential Therapy is based on humanistic-existential psychology. Therapists work with clients to help address a wide range of issues, helping them to find more satisfying and fulfilling ways of living.

While existing NCS counsellors may practice PCET-based counselling, the NCS aimed to create a separate PCET title. The NCS felt this would better reflect registrants' humanistic counselling practice.

CYPT and PCET registrants would be subject to the NCS' Code of Ethical Practice and existing requirements for supervision, CPD and insurance. They would also be subject to the NCS' complaints procedures.

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

Outcome

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

We issued no Conditions of Accreditation.

We issued the NCS the following Recommendations:

1. The NCS should review its guidance and communications to ensure that they assist the public and service users to easily search for individual practitioners and make informed decisions about its multiple registrant titles on its websites. (Paragraph 7.4)
2. The NCS should identify groups having a clear interest in its policies and processes. It should ensure there are mechanisms to consult with and take account of feedback. (Paragraph 7.7)
3. The NCS 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. (Paragraph 9.5)

Assessment against the Standards for Accredited Registers

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

- 1.1 NCS 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 NCS created a new title for therapists working with children and young people (CYPTs), reflecting the further skills and knowledge required by practitioners who work with these groups. The NCS' [Competency Framework for Working with Children and Young People](#) (the Competency Framework) sets out the knowledge and abilities required by CYPTs.
- 1.3 The NCS also created a new title for Person-Centred Experiential Therapists (PCETs). The NCS felt this would better reflect registrants' humanistic counselling practice. The NCS has developed specific competencies for registrants seeking to use the PCET title.
- 1.4 The NCS will display the CYPT and PCET titles on the NCS Counsellor Directory (the NCS' published register) with unique logos for ease of identification. The NCS may develop separate registers for each title in future.
- 1.5 Qualified CYPTs and PCETs would be eligible to join the existing NCS register. Current NCS registrants would need to demonstrate the specific CYPT or PCET competencies set by the NCS to use the new titles.
- 1.6 After two years, NCS registrants that do not have CYPT competencies will no longer be entitled to advertise related work as part of their NCS registration.
- 1.7 We noted that we had previously approved new titles for Accredited Registers that demonstrated specialist training and that allowed registrants to work exclusively with client groups such as children and young people.
- 1.8 We considered that the work of CYPTs and PCETs 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.'
- 1.9 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 We noted that the NCS demonstrated its commitment to protecting the public through its standards, its requirements for its registrants to undertake CPD, to have appropriate indemnity cover, to make relevant declarations of good character and good health, and also through its complaints procedure. These requirements would apply to CYPTs and PCETs.

- 2.2 The NCS had published its Competency Framework for CYPTs, setting out the 'additional competencies that a counsellor needs to work with children and young people ... underpinned by the fundamental principles of the NCS.'
- 2.3 We noted that the NCS had considered other standards relevant to the treatment of children and young people including risks of boundary violations and risks related to the environments where treatment takes place.
- 2.4 We noted that the NHS offers a form of Person-Centred Experiential Therapy as 'Counselling for depression (CfD)' within the Adult Improving Access to Psychological Therapies programme (IAPT) programme. We asked the NCS if it mapped PCET competencies to levels accepted by the IAPT. The NCS advised they were not, and that it would make this distinction clear in its communications. We will check this within our assessments of the NCS.
- 2.5 We found that compliance with this Standard was not affected by the change.

Standard 3: risk management

- 3.1 The NCS set out its understanding of risks presented when working with children and young people, including potential for exploitation or abuse of clients, inappropriate encounters with family members or other close contacts, and breaches of confidentiality.
- 3.2 The NCS set specific competencies to address such risks, requiring appropriate knowledge of safeguarding, child protection, working with adopted children and with looked-after children. The NCS also amended its Code of Ethics with standards for CYPTs.
- 3.3 We previously noted that 'child psychotherapist' was a title used by practitioners working within NHS Child and Adolescent Mental Health Services (CAMHS) who may belong to other registers. A perceived risk was identified that CAMHS services may not recognise potential differences in the levels of training and competence held between practitioners belonging to Accredited Registers. We had noted that it is for employers and commissioners of services to determine the level of assurance required for a role.
- 3.4 CYPT standards of proficiency will be published on the NCS website. The NCS told us that practitioners would need to demonstrate specific training to become a child mental health professional recognised by the NHS. They considered it unlikely that CYPTs would describe themselves as child psychotherapists. We will monitor registrants' advertising as part of our standard assessments.
- 3.5 The NCS confirmed that risks and mitigating actions for PCETs are covered by its existing risk management practices.
- 3.6 The NCS highlighted that the use of therapy-specific titles could help inform clients of the therapeutic approach used. We were concerned however that the introduction of new titles could confuse the public, so issued a Recommendation to address this within Standard 7.
- 3.7 We found that compliance with this Standard was not affected by the change.

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 NCS told us they would charge an administration fee for applicants applying for the new titles in addition to its annual registration 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 NCS formed subcommittees of its Professional Standards Committee (PSC) for the CYPT and PCET titles, chaired by subject experts.
- 5.2 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 We noted that the NCS' Competency Framework demonstrated its knowledge base for therapeutic work with children and young people, including talking and non-verbal therapies. The framework referred to relevant sources including the NHS CAMHS [Core competences for work with children/young people](#).
- 6.2 The NCS highlighted the existing knowledge base for person-centred experiential psychotherapy. We noted that the NHS had recognised a derivative of this as 'one of the four non-Cognitive behavioural therapy (CBT) therapy modalities approved for use in IAPT'
- 6.3 The NCS told us that the CYPT and PCET knowledge bases would be communicated through dedicated areas on its register website, on social media, and in its member newsletters.
- 6.4 We found that compliance with this Standard was not affected by the change.

Standard 7: governance

- 7.1 The NCS provided information about the CYPT and PCET subcommittees, chaired by subject experts. Their work would include assessment of non-standard applications to the register, scrutiny of applications, policy development, and providing expert support.
- 7.2 We considered a concern raised through the Share Your Experience process that it was not clear who was responsible for setting and maintaining standards within the NCS. The NCS told us that dedicated areas of its website would be developed to communicate information about the new titles. We noted the information provided on the NCS' [Society Committees](#) webpage and would monitor communication regarding governance.
- 7.3 The NCS provided examples of how registrants would communicate their titles on its existing register, including title-specific logos. This would include information about the competencies and standards related to each title. They

told us this would be further improved following the launch of a new register website.

- 7.4 We considered whether the introduction of multiple separate titles could confuse rather than assist the public to make informed decisions. Having to access multiple registers to identify a registrant may, for example, make it harder for people to raise concerns. We issued a Recommendation for the NCS to review its guidance and communications to ensure that they assist the public and service users to easily search for individual practitioners and make informed decisions about its multiple registrant titles on its websites. (Recommendation One).
- 7.5 Another concern stated that the NCS did not appear to have engaged with relevant stakeholders when developing its new titles. The concern suggested that a lack of suitable engagement could compromise development of relevant standards for new roles. The NCS told us they had consulted with their membership when developing the titles.
- 7.6 We considered that in addition to members and practitioners, patients and other stakeholders have an important role in informing decisions. We considered this especially important when working with vulnerable groups such as children and young people.
- 7.7 We issued a Recommendation for the NCS to identify groups who have a clear interest in its policies and processes and ensure that there are mechanisms to consult and take account of their feedback (Recommendation Two). The NCS told us that they agreed with the Recommendation and would implement this in the new titles' first year of operation.
- 7.8 We found that compliance with this Standard was not affected by the change.

Standard 8: setting standards for registrants

- 8.1 We noted that in addition to the Children and Young People Competence Framework, the NCS [Code of Ethical Practice](#) sets out requirements for the 'Treatment of Minors and Those Classified as Persons with Special Needs or Vulnerabilities'. This includes requirements for registrants to have appropriate Disclosure and Barring Service (DBS) certificates. The Codes highlighted the NCS' Safeguarding Policy.
- 8.2 The NCS had developed additional Good Practice Guidance for CYPTs, providing information about relevant legal frameworks as well as signposting to UK government guidance and other relevant bodies.
- 8.3 The NCS told us that following introduction of the CYPT title, practitioners on its original register would be able to advertise their work with children for a maximum of two years. Following this period, only CYPT registrants would be allowed to do so. Non-CYPT registrants who continued to work in those areas would not be able to refer to this as part of their registration with the NCS. This would not invalidate concerns raised against them with the NCS.
- 8.4 We found that compliance with this Standard was not affected by the change.

Standard 9: education and training

- 9.1 The NCS' present minimum registration requirements are counselling or psychotherapy qualifications at Ofqual Regulated Qualification Framework (RQF) Level 4 or equivalent. The NCS told us that after a two-year introductory period, it would require specialist qualifications for working with children and young people at RQF Level 5.
- 9.2 The NCS provided its updated Training Standards. We noted that competencies included stages of child development, the importance of arts and play, and working with trauma. CYPTs must also have specific competencies related to safeguarding, the legal implications of working with children and young people, making referrals, and liaising with parents and carers.
- 9.3 The NCS developed additional competencies for PCETs however the qualification requirement would remain at the Level 4 minimum.
- 9.4 We were not sure how existing NCS registrants gaining the CYPT and PCET titles would be assessed as meeting the required standards. The NCS told us that registrants would have a time-limited period to demonstrate they hold the relevant competencies, and that applications would be assessed by its expert-subcommittees.
- 9.5 We noted that NCS did not appear to have a documented process for assessing such applications and issued the following Recommendation: The NCS is to 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. (Recommendation Three). The NCS told us they agreed with the Recommendation and would implement this within a year of implementing the new titles.
- 9.6 The NCS set out how training standards for CYPTs and PCETs would be communicated on its website. We will monitor how the standards are communicated on the NCS' updated website in due course.
- 9.7 We found that compliance with this Standard was not affected by the change.

Standard 10: management of the register

- 10.1 The NCS set out how the CYPT and PCET titles would be accessible from its main online register. Title-specific logos would be visible on registrants' individual website profiles. We will check accessibility of the new titles on the registers as these are updated.
- 10.2 We found that compliance with this Standard was not affected by the change.

Standard 11: complaints and concerns handling

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

Share your experience

- 12.1 The NCS had supplied four Notifications of Change at the same time. Two are considered within this report. We had issued a combined Share Your Experience consultation for the four applications and received 22 responses.
- 12.2 Most responses were supportive of the NCS and its overall standards.
- 12.3 We received concerns for one of the other applications, stating that the NCS had not engaged with relevant stakeholders when developing its new titles, and that it had not made clear who in the organisation held responsibility for maintaining its standards. We considered this feedback when assessing the CYPTs and PCET applications under Standard 7.
- 12.4 We received an anonymous concern stating that the NCS may have admitted practitioners to its register that did not meet its requirements for 'face-to-face' learning with clients or tutors. We found no evidence of this, aside from necessary adjustments made during the Covid-19 pandemic. The NCS told us it had no plans to introduce different requirements for 'face-to-face' learning for CYPTs or PCETs.

Impact assessment

- 13.1 We noted and took account of the impact of our decision to approve the change.
- 13.2 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. This is discussed under Standards 3 and 7.
- 13.3 We considered that the changes may potentially make it challenging for the public to access services, or to identify a registrant when raising concerns. We advised that the NCS should consider such risks when developing its website and registers. We issued a Recommendations in line with this and will check the NCS' presentation of register titles in due course.

Equality duty under the Equality Act 2010

- 14.1 We had regard to our duty under the Equality Act 2010 when considering the notifications of change.
- 14.2 We noted that the CYPT register could help service users to find a practitioner with appropriate training to work competently with children and young people.