

Psychotherapists and Counsellors Professional Liaison Group (PLG)

Voluntary Register Transfers

Executive summary and recommendations

Introduction

This paper invites the PLG to discuss the voluntary register transfer processes for psychotherapists and counsellors.

Decision

The group is invited to:

- discuss the contents of the attached paper;
- discuss and set the criteria for identifying which voluntary registers transfer; and
- discuss the approach to making decisions about which registers transfer.

A further paper on this issue will be brought to a future meeting of the PLG.

The PLG is additionally reminded to bear in mind the potential equality and diversity implications of any recommendations it may make. This includes considering the extent to which any recommendations would have an adverse impact on some groups compared to others.

Background information

The PLG is invited to take into account the summary of responses to the questions asked in the Call for Ideas, in its discussions. In particular, the more general responses around diversity, education and voluntary registers.

<http://www.hpc->

[uk.org/assets/documents/100025ACpsychotherapists_and_counsellors_professional_liaison_group_20081204_enclosure01.pdf](http://www.hpc-uk.org/assets/documents/100025ACpsychotherapists_and_counsellors_professional_liaison_group_20081204_enclosure01.pdf)

Resource implications

None

Financial implications

None

Appendices

- Summary of organisations' responses to question four of the Call for Ideas.

Date of paper

12 February 2009

Organisation of the paper

This paper invites the PLG to discuss and make recommendations about the voluntary register transfers.

The first section of the paper provides background information, looking at the routes to registration; voluntary register transfers and criteria used by other organisations in making these decisions; highlighting some of the issues involved.

The second section outlines the responses we received to the Call for Ideas in these areas.

The third section provides a summary and discussion of some of the issues in order to aid the group's deliberations.

Section one: Background and context

This section provides background information on routes to registration and voluntary register transfers. It also provides information on criteria used by the Complementary and Alternative Medicine Working Group to make recommendations about which registers should transfer.

1.1 Routes to registration

When a profession becomes statutory regulated, there are four different routes to registration with the HPC. They are:

- Voluntary register transfer;
- UK approved programme route;
- Grandparenting; and
- International

This paper looks at the voluntary register transfer route to registration.

1.2 Voluntary register transfers

On the day that statutory regulation is introduced there would normally be a one-off transfer of one or more voluntary registers. These registers are normally held by voluntary membership organisations. The registers which transfer are specified in the legislation which brings the profession into regulation.

Anybody whose name appeared on the voluntary registers on the day before regulation was introduced would transfer to the HPC Register.

Shortly afterwards, we would write to all those who transferred asking them to renew their registration by signing a form and paying the registration fee.

For example, in October 2004 Operating Department Practitioners became regulated by the HPC. On the day that regulation was introduced, all those whose names were the day before on the register of the professional body, the Association of Operating Department Practitioners (now the College of Operating Department Practitioners) transferred to the HPC Register. Shortly afterwards, all those who transferred were asked to renew their registration by signing a declaration and paying the registration fee.

When a profession becomes regulated, the legislation specifies which voluntary registers will transfer.

Previously, the decision about which registers should transfer was made by the Department of Health. Broadly, in making the decision the Department of Health centred upon clear standards for entry to the register and a mechanism for removing members if necessary.

1.2.1 Purpose of voluntary register transfers

The purpose of the transfer of voluntary registers is to facilitate the easy registration of the majority of practitioners in the field at the earliest opportunity.

The process is designed to recognise that the practitioners on the voluntary registers have met the necessary standards and therefore they can transfer on to the HPC register without having to provide additional information to us.

The process is designed to be as inclusive as possible to reduce the numbers of individuals who have to apply via other routes. It is important therefore, that the criteria used to decide which registers should transfer reflect this inclusivity.

1.2.2 Voluntary register transfers and education and training

The Council's Education and Training Committee would normally approve all those programmes which have lead to membership of the voluntary register. This means that any individual who could have been a member of the voluntary register on the date of transfer but was not (perhaps because their membership had lapsed) would be able to apply to us via the UK approved course route.

1.3 Complementary and alternative medicine steering group

In 2006 the Department of Health set up a steering group to look at the statutory regulation of acupuncture, herbal medicine and traditional Chinese medicine practitioners and to make recommendations on how the professions should be regulated.¹

The steering group's work included making recommendations on which voluntary registers should transfer to the regulator on the day that the register opened. The steering group set ten criteria which it used to assess the voluntary registers. The criteria are:

1. The register should have been effectively operated for a minimum period of 5 years. Similarly the organisation hosting the register should also have been in existence for at least 5 years prior to the opening of the new statutory register.
2. The organisation hosting the register, whether a single register or a federated organisation should be established and a membership organisation able to speak with a unified voice.
3. The organisation hosting the register should have evidence of (a) a code of ethics informing a code of conduct, (b) clear definitions and expectations of educational standards and outcomes (c) demonstrably effective arrangements for the accreditation of educational programmes, (d) evidence of policies and procedures that would facilitate removal of individuals from a register, (e) evidence that the register recognises the importance of continuing professional development and encourages members to remain professionally up to-date and (f) involvement of lay members on key committees or have lay input.

¹ The full report can be found at:

<http://www.dh.gov.uk/en/Publichealth/Healthimprovement/Complementaryandalternativemedicine/index.htm>

4. With regard to accrediting educational programmes, effective procedures should be in place to (a) approve programmes of study, (b) monitor over a period of time their effectiveness against the stated aims and objectives for the programmes taking account of the success of students in attaining these stated, intended learning outcomes and (c) reviewing over time the continuing validity of these aims and objectives.
5. There must be an absolute separation between the financial/business activity of the organisation and those responsible for the accreditation and monitoring of educational programmes. It is acceptable for individuals to act as an accreditor but they should not stand to gain from a successful outcome.
6. The organisational structure and constitution of the body, including the membership and terms of reference of all committees, should be available with evidence of active participation and operation over a minimum of a 5-year period.
7. The minimum size of a viable register will normally be 300 individuals, except where the traditions are extremely small.
8. It should be clear from the organisation that the criteria for inclusion on the professional register include language proficiency, health and fitness to practice, integrity, honesty, comprehension of written and spoken English, conduct and the attainment of minimum educational standards. There needs to be effective disciplinary procedures covering complaints from the public with appropriate separation in determining whether a prima-facie case exists and appropriate procedures for an investigation where necessary.
9. There should be procedures in place covering re-registration of individuals who have been removed from any register for any reason.
10. There should be evidence that the body is aware of the importance of criminal record disclosure and the necessity for this in order to protect the public.

The steering group sent the criteria above to professional bodies representing practitioners using herbal medicines or acupuncture. The professional bodies were asked to submit evidence to show how they met the criteria. Their submissions were then assessed by an external organisation to see how well they met the criteria and those recommendations were then passed to the steering group.

Section two: Responses to the Call for Ideas

In the Call for Ideas we asked respondents to suggest criteria that could be used to decide which voluntary registers should transfer to HPC. In the document we suggested the following criteria:

- clear criteria for entry to membership (which might include the accreditation or approval of education and training programmes);
- a mechanism for dealing with complaints about members and the ability to remove from membership if necessary;
- a commitment to the Continuing Professional Development (CPD) of its members; and
- lay involvement in decision making.

2.1 Call for Ideas – suggested criteria for voluntary register transfer

2.1.1 Criteria for membership of the voluntary register

In the Call for Ideas document one of the criteria we suggested was that there should be clear criteria for entry to membership, perhaps including accreditation or approval of education and training programmes.

Several respondents, including Relationships Scotland and Stirling and District Association for Mental Health (SDAMH), commented that the voluntary register should have 'clear criteria for entry to membership'. The National Register of Hypnotherapists and Psychotherapists said that the organisation should have United Kingdom Council for Psychotherapy (UKCP) registrant status. Bath Centre for Psychotherapy and Counselling (BCPC) commented that the entry requirements should include Accreditation of Prior Learning and Accreditation of Prior Experiential Learning standards and procedures.

Most respondents who answered this question in the Call for Ideas commented that the education and training requirements were important criteria in deciding which registers should transfer. The Improving Access to Psychological Therapies (IAPT) workforce team highlighted the importance of the 'quality' of the standards of education and training. Association for Cognitive Analytic Therapy commented that clear standards of education and training approved by the '...current professional body for the therapy and UKCP' were important.

A number of respondents, including the Metanoia Institute, Counselling and Psychotherapy Central Awarding Body (CPCAB), BCPC and an individual, commented that the education and training should have systems of external assessment, accreditation and quality assurance. The Association for Group and Individual Psychotherapy suggested that the training should be subject to '...regular review processes such as the Quinquennial Reviews carried out by UKCP/Council for Psychoanalysis Jungian Analysis'.

However one individual commented that they doubted whether the membership requirements of the voluntary registers '...include anything that can justifiably be considered a standard'. They added that the only realistic criteria for determining which registers should transfer would be that they display '*...clear evidence*

[original emphasis retained] that the registrants practise “safely, lawfully and effectively”.

2.1.2 Complaints

In the Call for ideas document one of the criteria we suggested was that there should be a mechanism for dealing with complaints about members and the ability to remove from membership if necessary. Most respondents agreed that this was an important criterion for assessing whether registers should transfer. The CPCAB commented that in addition to the voluntary register having a complaints process, there should be no upheld complaints or sanctions against someone who transfers to HPC.

A number of respondents including, Counsellors and Psychotherapists in Primary Care (CPC), United Kingdom Association for Humanistic Psychology Practitioners (UKAHPP) and an individual, commented that the voluntary register should have a ‘clear code of ethics’. Adherence to this code could be maintained through a process for dealing with complaints which had clear guidance, timetables, processes and sufficient resources. Relationships Scotland, the British Psychoanalytic Council and the British Association of Counselling and Psychotherapy (BACP) all said that the complaints process should have lay involvement where appropriate. The BPC added that the complaints process should have ‘... public protection as their primary objective’. The BACP suggested that the panels involved in looking at complaints should be ‘...trained to a minimum of lay magistrate standard’. The International Society of Professional Counsellors (ISPC) commented that if a person has signed up to a code of ethics then their training and qualifications may well have been checked. ‘People who have volunteered to be answerable for the [sic] practice in ISPCs experience are genuine and trustworthy people who have little to hide’.

2.1.3 Continuing Professional Development

A number of organisations commented that a commitment to CPD was an important criterion. This included SDAMH, Relationships Scotland, Association of Christian Counsellors (ACC) and Counselling in Scotland (COSCA). Both CPCAB and Relate recommended that there should be significant requirements in terms of the number of hours of CPD that individuals should undertake.

2.1.4 Supervision

A number of respondents, including CPCAB, Relationships Scotland and COSCA said that the voluntary register should set requirements around the supervision of members’ client work. Relate commented that the registers should meet specific requirements in terms of the ‘amount and regularity of supervision required’.

2.1.5 Minimum client hours

Both CPCAB and Relate suggested that one of the criteria for transfer should be that the voluntary register specifies a minimum number of client hours worked.

2.1.6 Renewal of registration processes

Several respondents, including Association for Rational Emotive Behaviour Therapy (AREBT) and KCC Foundation, suggested that one of the criteria should be that the voluntary register has a process for renewing the membership of those on the register. Some respondents included CPD requirements as part of the process for renewing registration.

2.1.7 Length of time

Several respondents suggested that one of the criteria should be that the register should have been established for a number of years. United Kingdom Association for Psychotherapeutic Counselling (UKAPC) suggested that the register should have been in existence for a minimum of 7 years, whilst both UKAHPP and The Centre for Humanistic Psychology and Counselling (CHPC) suggested this criterion but did not specify a number of years.

2.1.8 Membership Organisation

A number of respondents also suggested criteria based upon the status of the organisation holding the voluntary register. UKAPC suggested that the organisation should be able to demonstrate financial stability for at least 7 years; whilst the Cambridge Society for Psychotherapy suggested that the organisation should be able to provide 'audited financial arrangements'. The UKAHPP suggested that only those organisations which had an '...accountable administrative structure, including charity or company status, published accounts, insurance, registration with information commissioner' should be considered.

However, other respondents focused on how the organisation and voluntary register were perceived both within the profession and by external stakeholders. Both British Association for Behavioural and Cognitive Psychotherapies and AREBT commented that the registers should be considered as reliable sources for employment and referral. These comments were supported by several individuals who suggested that the registers should be recognised by Employee Assistance Programmes or the NHS. The Tavistock Centre for Couple Relationships said that nationally recognised psychotherapy/counselling registers that have accreditation of training etc should transfer but local self-selected registers which do not have governance procedures should not transfer. By contrast the Cambridge Society for Psychotherapy said that those registers which did not meet the criteria applied by UKCP in their recognition and acceptance of member organisations should not transfer to HPC.

2.1.9 Criteria about the Register

A number of respondents suggested criteria based upon the voluntary register itself. The BACP and CHPC both commented that the size of the register was an important consideration in deciding whether it should transfer to HPC. Other respondents, including BABCP, commented that the register should '...represent the majority of a particular modality or title and are exclusive to that modality having minimum or no overlap with any other register registering the same title'. The British Psychoanalytic Council (BPC) commented that the registers which transfer should be publicly available.

2.1.10 Lay involvement

In the Call for Ideas document, we suggested that one of the criteria for voluntary register transfer could be lay involvement in decision making. Both the Association of Child Psychotherapists and the BPC agreed with this suggestion. However, Surrey Counselling and Psychotherapy Initiative asked for more clarity of 'lay involvement in decision making' as they were concerned that if this meant 'service users' this would have to be thought through carefully owing to concerns about transference.

2.1.11 Moderation systems

Both the CPC and Metanoia Institute commented that they believed that the voluntary register should have review procedures which included an external moderator.

2.1.12 Link between voluntary register standards and HPC

A small number of respondents, including WPF Therapy, commented that the standards which the voluntary register used should be the same as those of the HPC. One individual commented that '...the criteria for entry to the particular voluntary register should ensure that the Standards of Proficiency are met'.

2.1.13 Other suggested criteria

Respondents also suggested other criteria which could be used to decide whether a register transfers. CPCAB suggested that the register should require that its members have professional indemnity insurance. Manchester College commented that the organisation should provide conferencing and that it should help to '...engender a research culture in counselling'. The Metanoia Institute said that the register should have a '...well established self-regulatory mechanism already in place to assess and monitor different modality groups that already meet the standards of a generic professional title'. One individual commented that the '...only meaningful criteria would be whether a practitioner has a history of proven effectiveness and probity'.

2.2 Comments about the voluntary register transfer

Alongside comments about the criteria for deciding which voluntary registers transfer we also received general comments about the process. These comments are outlined below.

Several respondents, including the Counselling Society and Chrysalis, commented that it was important that the decisions about which registers transfer should be inclusive and include as many registers as possible. One individual commented that some voluntary registers were faith based but the training still met HPC standards. Unless all registers were allowed to transfer the result could be 'discrimination on religious grounds'.

A small number of respondents raised concerns about regulation through the HPC, including one individual who commented that the voluntary registers should

remain voluntary as statutory regulation was unnecessary. The Centre for Freudian Analysis and Research commented that not everyone is confident that HPC is an appropriate body to regulate psychoanalytic practice. They said that psychoanalysts would want to retain the right to ‘...have a position outside the “approval” of HPC-style regulation if they feel that being inside it would conflict with their ethical understanding of their work with members of the public’. The Psychoanalytic Consortium commented that organisations should only transfer to HPC if they were sure that ‘...HPC has a full understanding of the nature of the transference and its implications as well as the theoretical and philosophical stance of their practices’.

Several respondents identified registers which they believed should transfer to HPC. Both The Cambridge Body Psychotherapy Centre and The Association for Family Therapy recommended that UKCP’s register should transfer to the HPC because it met the necessary standards. One individual respondent suggested that the BACP should transfer because it held sufficient authority and met the necessary standards. By contrast, COSCA commented that HPC should consider the registers held by voluntary sector counselling organisations.

Two respondents, including The British Association for Dramatherapy, highlighted that some of the membership organisations offered different types of membership depending on experience. Respondents commented that it would be important to differentiate between these different types of membership when the registers transferred.

Two respondents asked questions in their response about the process of voluntary register transfer. COSCA asked HPC to provide guidance on data protection legislation to ensure that organisations with voluntary registers which transfer do not breach data protection in supplying information to HPC. Surrey Counselling and Psychotherapy Initiative asked what would happen if the profession disagreed with the decisions on which registers included/excluded.

2.3 Information from voluntary membership organisations

In the Call for Ideas, we also asked respondents who represented voluntary membership organisations to provide us with information on:

- the number of members and the extent to which this number is likely to overlap with membership of other organisations;
- arrangements for determining entry to membership; and
- arrangements for considering complaints about members.

We have summarised the information we received in response to this question in Appendix 1.

Section three: Points to consider

The context outlined in this paper and the Call for Ideas, reveal a number of broad considerations that the group will wish to take into account when making decisions about the criteria for identifying which voluntary registers.

The focus of this section is on the issues relevant to regulation and regulatory processes. This section is not intended to be exhaustive and there may be further topics that the group may wish to discuss.

When discussing the points identified below the group may wish to keep in mind:

- The importance of inclusivity in deciding which registers should transfer.
- The need to make decisions in a fair way taking into consideration all available information.

3.1 Criteria for voluntary registers

The PLG is invited to consider the criteria for deciding which registers should transfer which were proposed in the Call for Ideas responses. In summary the proposed criteria were:

- entry criteria, including accreditation of education and training;
- a mechanism for handling complaints;
- a commitment to CPD;
- supervision of client work;
- a minimum number of client hours;
- that the register should have registration renewal processes;
- that the register should have been established for a number of years;
- that the organisation holding the register should be properly established and be perceived well by the profession;
- that the register should be of a minimum size;
- that the register should be representative of the majority of a modality or title;
- that the register should be publicly available;
- lay involvement in decision making;
- review procedures including external moderation;
- a link between the voluntary register's standards and the HPC's;
- a requirement for members to hold professional indemnity insurance;
- that the organisation should offer conferences and be part of a research community; and
- that the register should have a self-regulatory mechanism.

The PLG is invited to consider the above criteria bearing in mind the following points:

- whether the criteria is necessary to ensure that the standards are met and that the public is protected;
- whether using the criteria to make decisions would reduce the inclusiveness of the process; and
- whether there are any other criteria that should be included.

The group may also wish to consider the strengths and weaknesses of the criteria established by the CAM working group.

3.2 Decisions

Having considered the criteria, the PLG is invited to identify which criteria should be used to decide whether a voluntary register should transfer.

The PLG is also invited to consider what evidence the voluntary registers could supply to show how they meet the identified criteria.

The PLG is invited to discuss the approach to deciding which registers should transfer. The group is invited to consider the following points:

- That the information provided in the responses to the Call for Ideas is variable and that HPC has not yet been able to collect all the information from those who did not supply it with their response.
- Whether it would be more appropriate for HPC to make the decisions about which registers should transfer as the register will be held by HPC.

3.3 Structure of the Register

The group discussed the structure of the Register for psychotherapists and counsellors at its previous meeting in January. The group decided that there should be differentiation between psychotherapists and counsellors. However, the group also agreed that this decision should be revisited as necessary in light of other discussions.

Differentiation between psychotherapists and counsellors would mean that any voluntary register which transferred to HPC would also have to clearly differentiate between psychotherapists and counsellors. This would rely on accurate information about the register and the individuals on the register. Alternatively, if no differentiation was possible then individuals on the register might have to transfer to both the psychotherapists and counsellors sections.

The group may want to discuss whether it would be possible to identify psychotherapists and counsellors on the registers which transfer.

3.4 Differing levels of membership

Some organisations with voluntary registers offer different types of membership. The BACP for example has student member, associate member, member, accredited member and affiliated member. The different levels of membership are based on the level of training that has been completed and the length of time that the individual is on the register. To become accredited an individual must have been on the BACP's register and then work towards accreditation.

The PLG may wish to consider whether individuals who meet the minimum membership criteria should transfer or whether only those individuals who meet additional criteria should transfer.

3.5 Transferring multiple voluntary registers

On the day the Register opened for Operating Department Practitioners, the Register held by the Association of Operating Department Practitioners (now the College of Operating Department Practitioners) transferred to HPC on the same day.

The administrative burden of transferring one register is reasonably small. However, if a number of registers are recommended for transfer to HPC it may not be possible to transfer all of the data on one day. It may be necessary to stagger the transfer of registers to ensure that the transfer to HPC happens efficiently.

3.6 Other registers

Some respondents to the Call for Ideas suggested that it might be possible to transfer registers held by organisations which were not membership organisations or professional bodies so long as the Register met the necessary criteria. This could include registers held by employers. It was argued that transferring registers from employers would make the process more inclusive and could be particularly useful to individuals working in the voluntary sector.

The PLG may wish to consider whether other registers could transfer if they met the necessary criteria. In particular, how these registers might meet the criteria around the length of time that the register had been in place. The PLG is invited to discuss this proposal in light of the comments in the Call for Ideas about inclusivity and accessibility.

Appendix 1

Name of Organisation	No. of members	Overlap with other organisations' registers	Member of another organisation	Entry to membership	Complaints process
United Kingdom Association for Psychotherapeutic Counselling	112 registrants	No	Not known	UKAPC accredits training and lays out training requirements which member organisations must follow including core curriculum and number of hours in practice	UKACP's complaints process is followed when that of the member organisation has been exhausted. UKAPC publishes a Code of Ethics and Professional Practice
Federation of Drug and Alcohol Professionals	500 (200 are counsellors)	No	Not known	FDAP membership is open to anyone working or training in the field of drugs and alcohol. Either individual or affiliated organisation	Complaints process looks at breach of Code of Practice. Complaint must be related to events within the last three years. Complaint goes through initial consideration process before referral for a hearing. Range of sanctions from written warning to expulsion. Member complained against can appeal the decision.
Metanoia Institute	700 students (500 therapists, 200 counsellors) & over 650 graduates	Not known	Metanoia is an organisational member of many organisations, including both the BACP and the UKCP	Different levels of membership depending on whether the individual has completed a Metanoia training course.	Complaints process looks at breach of Code of Practice. Complaint should be related to events within the last three years. Complaint goes through initial consideration process before referral for adjudication. Range of sanctions from an apology to expulsion. Member complained against can appeal the decision
Counsellors and Psychotherapists in Primary Care	800	Around 40 register with UKCP. Others accredited with BACP (no information on those numbers)	Not known	To become a full member an applicant has to meet the training standards set by CPC. This includes a minimum number of hours in practice and in supervision.	Complaints process looks at breach of Code of Practice. Complaint must be related to events within the last three years. CPC has a mediation procedure which can be adopted following a complaint about a member. Complaint goes through initial consideration process before referral for a hearing. Range of sanctions from written warning to expulsion. Member complained against can appeal the decision.

Appendix 1

United Kingdom Council for Psychotherapy	5200	large amount of overlap with many other organisations	No	The usual requirement is the completion of a masters level course in psychotherapy or an accredited course in psychotherapeutic counselling which meets the requirements of the training standards of the relevant UKCP modality section.	Complainants are invited to complain to the relevant member organisation first. If at the end of the process the complainant believes there were problems with the member organisation's procedures, or that the findings were unreasonable or unjust, they can appeal through UKCP's Central Final Appeal Procedure.
Re.Vision		50 UKCP registered graduate members	Counselling training accredited by BACP, psychotherapy training accredited by UKCP	To become a member the individual completes training offered by Re.Vision	BACP members would be subject to BACP complaints process. Other members subject to Re.Vision complaints process. Complaints should be related to events in the last three years. Informal mediation phase followed by formal investigation if the complaint is not resolved. Sanctions range from a requirement to improve to termination of membership. Member complained against can appeal the decision.
British Association for Dramatherapy	approx. 213			To become a full member an applicant has to be HPC registered.	BADth has a Code of Practice.
UK Association for Humanistic Psychology Practitioners	400	Partial. For all but 10 members UKAHPP is the primary membership organisation		For full membership minimum 450 hours of specified tutor contact training for counsellor accreditation and minimum 900 hours for psychotherapist accreditation, plus other requirements	Complaints process includes a mediation stage. If that is not successful the complaint is referred on to an investigation stage and then on to a hearing. Sanctions range from a requirement to improve to termination of membership. Member complained against can appeal the decision.

Appendix 1

British Association for Behavioural and Cognitive Psychotherapies	6788	CBT part of UKCP register can not contain those not accredited with BABCP or AREBT. Joint register of accredited members with AREBT.	Membership of UKCP	BABCP & AREBT have a joint accreditation process which determines entry as an accredited member. Process requires completion of an application form showing evidence that the applicant meets criteria in training, supervision CPD and other areas.	Complaints committee investigates all complaints received. Recommendations are made from the Complaints Committee to a Disciplinary Committee which has a majority of lay members and a lay chair. Various sanctions available up to exclusion from the register.
KCC Foundation	200	possibly with BACP (numbers not known)	Membership of UKCP	Applicants must have completed training run by KCCF. At present this is the MSc in Systemic Therapy.	There is a complaints procedure for members of the register and for the training.
Person Centred Therapy Scotland	270	all members will also be members of BACP, COSCA, BPS, UKCP or AHPP		Applicants must have completed a training course accredited by the Association or BACP. They must be working and supervised as a person centred therapist.	One of the membership requirements is that the member is an individual member of a professional organisation with an official complaints procedure.
The Counselling Society	approx. 2000	10% overlap with other organisations		Members must complete an accredited course or meet specified training hours and supervision requirements or demonstrate that they have completed the necessary units of training and practice. Accredited membership also offered.	The Counselling Society has a Code of Ethics. Complaints must be lodged within three years of the alleged breach. Allegation must be a breach of the Code of Ethics. Complaint goes to a Professional Conduct Hearing to decide whether the complaint is proved and then if proved impose a sanction. Sanctions range from an apology to termination. Members can appeal against a decision
Association for Cognitive Analytic Therapy	128 CAT Psychotherapists & 317 CAT Practitioners	CAT Psychotherapists have membership in UKCP. Overlap may also exist with Royal College of Psychiatry, British Psychological Society or Royal College of Nursing	Member Organisation of the UKCP & falls within the Humanistic and Integrative Section (HIPS) of this organisation	ACAT has established criteria for accrediting practitioners and psychotherapists, approved by UKCP.	ACAT has a written Complaints Procedure and Ethics Panel for dealing with complaints about members.

Appendix 1

Relate	200 registered supervisors & 2000 registered practitioners	partial but information not known		Relate has criteria for membership of the register of supervisors and will have criteria for membership of its practitioner register.	There are arrangements in place for considering complaints about members of the register of supervisors. There will be similar arrangements for the practitioner register.
Relationship Scotland	Membership consisting of 23 Local Services across Scotland.	Not known	COSCA	Most counsellors are trained through a Diploma in Couple Counselling.	Informal complaints process which is then followed by a formal process if the complaint is not resolved. There is an appeal process.
College of Psychoanalysts	140	All members with other psychoanalytic organisations in UK and abroad. Most are registered with either UKCP or BPC		Applicants must meet membership criteria including completion of a training course in psychoanalysis, sufficient clinical practice under training and evidence of personal analysis	The College has a Code of Professional Conduct. Any complaint that a member is in breach of the code is heard by the Professional Conduct Panel of the College.
National Register of Hypnotherapists and Psychotherapists	477			Open to those who have completed training with UKCP & to a graduate of NCHP	Complaints originally considered by Board of Directors to see if it needs to be referred on or can go for mediation. If referred on to a hearing then decision made by representatives from Board of Directors. Member can appeal both within NRHP and also to UKCP Central Final Appeals Process.
British Association of Play Therapists	247 Full members, 71 student members, 60 associates	some overlap with BACP and UKCP although exact numbers unknown		Applicants must demonstrate that they have completed a BAPT accredited qualifying programme, a named supervisor and a current CRB check. From 2009 qualification to become a registered Play Therapist will require completion of 450 hrs supervised practice.	Complaints must be within three years of the alleged breach of the Code of Conduct. There is an informal complaints resolution process as well as a formal process if the complaint can not be resolved. If the complaint is referred to a hearing there are a number of sanctions from supervision to suspension of membership. There is an appeal process.
Association of Christian Counsellors	Information not available	Not known		Information not available	Information not available

Appendix 1

Association for Family Therapy	2000 members	640 registered with UKCP. Others Likely to be registered with professional practice other than psychotherapy	Member of Family Couple, Sexual and Systemic Therapy Section of UKCP.	Applicants must have completed an AFT accredited course. Training delivered at different levels with criteria for each level	AFT has a Code of Ethics and Practice. If complaint could represent a serious breach, the complaint is investigated and then referred to a committee hearing. There is also a mediation and conciliation process where the complaint does not involve serious misconduct. There is an appeals process.
Association of Child Psychotherapists	Information not available	Information not available	Information not available	Information not available	Information not available
Minster Institute	130	All UKCP registered. ~15% BACP accredited	Full organisational member of UKCP & is one of accrediting organisations of the HIP (Humanistic & Integrative Psychotherapy) section. Accredited organisational member of BACP. Also member of UK ATC, UK API, EAP and EACPI	Applicants must have completed their training programmes, show evidence of completing a minimum of 450 supervised clinical practice hours, have testimonies from current clinical supervisors and show evidence of CPD.	There is a complaints and grievances procedure for considering complaints against members.
Cambridge Society for Psychotherapy	60	Most registered with UKCP. ~8% members of other organisations	Registered member with UKCP	Applicants must have completed an approved qualification or demonstrate alternative experience.	Arrangements for considering complaints in line with UKCP guidelines.
Association for Group and Individual Psychotherapy	119	unknown	Member of UKCP and CPJA	AGIP has a detailed training process which complies with the UKCP's Training Standards and the CPJA's competencies for psychoanalytic practice.	AGIP has a clear and detailed complaints process which complies with the UKCP's Ethics and Professional Conduct requirements and also with the CPJA's Complaints and Disciplinary Processes.
Association for Rational Emotive Behaviour Therapy	1391 accredited members	no overlap with other professional memberships	Lead organisation under Cognitive Behavioural section of UKCP	AREBT run an accreditation scheme alongside the REBT	AREBT has a complaints process similar to the BABCP one.

Appendix 1

Bath Centre for Psychotherapy & Counselling	86 psychotherapists, 74 counsellors & 92 trainees	~80% overlap with BACP			Complaints must be made within three years of the event. Informal stage involving mediation leading to formal stage if complaint not resolved. Sanctions range from requirement to improve to removal from register.
British Psychological Society	46,000. 13,000 competent to provide psychological therapies			Applicants must meet the Graduate Basis for Registration and then become Chartered with membership of a relevant division.	BPS has a complaints process for dealing with concerns.
Tavistock Centre for Couple Relationships	Information not available	Not known	Not known	Entrance to full membership is by completing TCCR's Psychotherapy training.	Information not available
British Association for Sexual and Relationship Therapy	Awaiting information from membership questionnaire	About 1/3 registered with UKCP.	Not known	BASRT offers general and accredited membership. To become a general member applicants must either be involved in research or practice in sexual/couple/relationship therapy	Complaints should be within a five year period. Complaints are investigated and if appropriate sent for mediation. If mediation is not appropriate, the complaint is referred to a Complaints Panel. Trustees then look at the Complaints Panel decision and decide if any sanctions are appropriate. Sanctions range from requirement to improve to expulsion. There is an appeals process.
British Psychoanalytic Council	1200 (increase to 1400 by April 09)	140 registrants members of Royal College of Psychiatry, 150 Association of Child Psychotherapists, 250 Association of Psychoanalytic Psychotherapists in the NHS, <100 members of BACP or UKCP		Applicants must have qualified from one of their 10 member institutions' training courses. Each member institution has its own specific standards and criteria but BPC also sets standards of education and training.	All BCP registrants are governed by a single Code of Ethics and single Complaints Procedure. The Complaints Procedure allows a range of sanctions where a complaint has been found against a member including removal. The decision making process involves lay members both at screening committee and at the professional conduct panel.
Register for Evidence based Hypnotherapy and Psychotherapy	40 (anticipated grow to 300-500 within next 2 years)		Register is associate member of UK Confederation of Hypnotherapy Organisations	Registrants must complete an appropriate training in evidence-based hypnotherapy and psychotherapy.	The Register has a complaints officer with a published code of practice and procedures.

Appendix 1

British Association for Person Centred Approach	Information not available	Information not available	Information not available	Information not available	Every member of BAPCA is required to be a member of an organisation with an enforceable code of ethics.
Council for Psychoanalysis and Jungian Analysis (UKCP section)	1200	Overlap with British Psychoanalytic Council	UKCP	Section of UKCP	Section of UKCP
Play Therapy United Kingdom	633	10% overlap with other organisations	affiliated with Play Therapy International (PTI)	Different levels of membership. Members must have completed a recognised/accredited award.	Complaint must be lodged within 3 years of the event. Mediation is encouraged before the complaint comes to a formal decision process.
International Society of Professional Counsellors	197	~20% with CCC, BACP and UKCP		Membership entry is at 4 levels. Student, associate, full and fellow. Membership is granted on levels of training and experience.	If a client complains about a member the member is contacted and asked to respond. The client making the complaint is then notified of the response. If the complaint is then pursued there is a hearing with the member which is in the presence of 3 board members and 3 outside people. The client & the member is then contacted with details of the outcome of the hearing. There is the right to appeal by members and clients.
Association for Humanistic Psychology in Britain	Information not available	Information not available	Information not available	Information not available	Information not available
Guild of Psychotherapists	250		Member of UKCP	Trainees complete the training offered by the Guild.	Complaint must be lodged within 3 years of the event. Complaint is passed to the Ethics Committee which decides whether it should go further. Conciliation offered but if unsuccessful sent to a hearing. Sanctions range from written warning to expulsion. Members can appeal.
National Association of Counsellors, Hypnotherapists and Psychotherapists	~100	little overlap	Not known	Different membership criteria based on whether a counsellor, hypnotherapists and psychotherapists	Company Secretary decides whether the complaint should be investigated. Complaint then considered at a disciplinary hearing. Sanctions range from a private verbal reprimand to blacklisting a member.

Appendix 1

Counselling and Psychotherapy in Scotland	700 (580 individual & 120 organisational)	36 counsellor members also members of BACP		Different levels of membership ranging from student to accredited. Practitioner members must meet requirements around number of hours, supervision and CPD	Complaint must be submitted within three years of the events. Complaint considered by Chief Executive and then considered by investigation panel. If case to answer, recommended that it goes to mediation first. If mediation unsuccessful, referred to complaints panel. Sanctions include termination of membership.
London Association of Primal Psychotherapists	63 (at different membership levels)	UKCP	member of UKCP	Different levels of membership. To become a full member individuals must have completed the academic requirements of the course as well as meeting supervision & personal therapy requirements	Information not available
British Association for Counselling and Psychotherapy	30,379 individual 1,157 organisational membership	~20% of UKCP and 9% BCP registrants belong to BACP	No	Different levels of membership. Applicants for membership must have completed a minimum of 1 yr qualification in counselling/psychotherapy with supervised placements.	Complaints should be within 3 years of end of professional relationship or alleged misconduct. Complaint referred to a pre hearing assessment panel which decides whether it should be referred. Range of sanctions available at professional conduct hearing. Members can appeal the decision
British Association for Psychoanalytic and Psychodynamic Supervision	>200	all members registered with UKCP, BACP, UKRC or BPC	No	Members must be registered with UKCP/BPC or accredited with BACP.	Information not available
WPF Therapy	~200 trainees	Qualified trainees become members of Foundation of Psychotherapy and Counselling	WPF is member of BACP and UKCP	Organisation does not have members but has trainees undertaking training.	They share a code of ethics with the Foundation for Psychotherapy and Counselling.