

# Accredited register consultation 2024

## Professional Standards Agency

### Submission in relation to the SCoPEd framework in the psychotherapy and counselling profession. Submitted by

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### Background

This submission relates to research and consultations with counsellors and psychotherapists during the period of development of the SCoPEd framework 2018-2024. The CTUK produced two reports on the implications of SCoPEd in 2020 and 2022 which can be accessed on the CTUK website<sup>1</sup>. The data we use in this submission was carried out by Dr Cotton in collaboration with the CTUK in 2020/21 (1500 respondents) and 2023 (750 respondents) looking at the financial and professional landscape for counsellors and psychotherapists and the implications of SCoPEd. This second financial landscape report attempts to mark the changes in the wages and working conditions of counsellors and psychotherapists as a result of the cost of living crisis. Our 2020/21 survey reviewed the impact of Covid-19 and respondents' sense of how the landscape is changing, including how SCoPEd will affect their working lives. Using the same questions but including questions about the cost of living crisis we carried out a second survey in 2023 to see what if any changes have taken place<sup>2</sup>.

### Our key concerns about the introduction of SCoPEd are as follows.

#### 1. Financial sustainability for therapists and counsellors

We are concerned that SCoPEd will further deepen the financial unsustainability of working in the therapy and counselling sector. Our survey findings from 2023 show:

- 65% earn less than £600 per week (gross income) which is the median earning for employed people in the UK
- 18% currently work unwaged with 36% previously working unwaged in 2020/21
- 49% worried about covering their costs of living this year
- 42% increased therapy workload to cover increased costs
- 59% of respondents earn their main income in counselling and psychotherapy
- 23% increasing work outside of therapy to cover costs
- Reduction in part time work from 51% in 2020/21 to 41% in 2023

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<sup>1</sup> <https://ukcounsellors.co.uk/wp-content/uploads/2020/07/Critical-Evaluation-of-SCoPEd-July-2020-by-CTUK.pdf> and <https://ukcounsellors.co.uk/a-critical-analysis-of-the-changes-to-the-january-2022-edition-of-the-scoped-framework/>

<sup>2</sup> This research will be published in 2025 but the data can be submitted to the PSA on request to the authors.

- Significant reduction in earnings of £0-99 per week to 17% in 2023 down from 30% in 2020/21
- Shifting patterns of providing twice monthly instead of weekly sessions, losing clients early and having to introduce low/no fee systems
- 63% cut their professional costs: 46% cut CPD and 29% cut personal therapy
- 55% (51% in 2020/21) of respondents went into debt while training and 36% while in work, up from 30% in 2020/21
- 16% (14% in 2020/21) of respondents receive income based welfare benefits with 4% accessing food banks while training and 3% while working as counsellors/psychotherapists, the same figures for 2020/21

Only 3% of 2023 survey respondents felt that SCoPEd offered them higher opportunities for paid work and 1% felt it would lead to income increase, rising to 13% responding they anticipated a fall in income. As a result of these financial realities, a high level of 33% (30% in 2020/21) of respondents cannot see a future earning a living as a counsellor or psychotherapist.

## 2. Deepening inequalities in the sector

The demographics of the sector revealed a familiar picture of 76% women, 77% white British and ages clustered between 35-65 years with 70% of respondents 45 years and older. There is a high level of disability within the sector at 38% (28% in 2020/21), higher than the UK national average of 18%.

Within the psychotherapy and counselling profession there is a two tier system which is based on pre-existing inequalities in terms of class, race, gender and disability. The SCoPEd framework will entrench those inequalities already inherent in the profession by formalizing a system of unwaged work (450 unwaged clinical hours) tied to professional accreditation and associated costs of accredited trainings required to progress from category A to C and the raised cost of monthly professional membership fees. The lack of clarity and consultation around the financial implications of SCoPEd are reflected in our survey findings that many respondents do not feel they know enough about SCoPEd to measure the potential impact for them. For those respondents who had a view on SCoPEd 10% felt they would fail to get accredited under this new system and 19% felt it would lead to lower diversity within the profession, down from 40% in the 2020/21 survey. Only 1% felt SCoPEd would lead to higher diversity.

One of the ways that inequalities are reflected in the SCoPEd document is in the discriminatory and fundamentally flawed formulation of what it means to be a Category A therapist. Throughout the SCoPEd framework it makes an assumption that Category A therapists who are significantly more likely to come from disadvantaged groups are less likely to be able to work with issues of power and discrimination (e.g. Sections 3.10 and 4.11). We would contend that therapists who are working class, from black and minority ethnic communities, disabled or neurodiverse and who have therefore been less likely to secure funding for trainings and unwaged work are more likely to be able to understand the precise nature of discrimination than those who are not. SCoPEd

formalizes disadvantage as a personal and professional failing rather than as a result of the professional bodies having created a regulatory and accreditation structure that many existing and future therapists simply cannot afford.

### **3. Further de-professionalisation of therapy**

The crisis in mental health funding and the subsequent degradation of the model of therapy that now dominates in the NHS is well documented<sup>3</sup>. Through its formulation of the nature of work undertaken in Category A the SCoPEd framework stands to undermine further the professional standards within the sector. In section 4.9 it claims that a distinguishing characteristic of Category C therapists is that only they and not Category A or B therapists can use theory to conceptualise the unconscious in their work. To remove the central principle within therapeutic work that we can conceptualise and therefore work with unconscious material undermines the work of Category A and B therapists. Further, SCoPEd's definition of Category C therapists misunderstands the nature of therapy and the diversity of practice within the profession. It subsequently leaves Category A and B in a regulatory grey zone about their work with unconscious material and therefore professionally unprotected. Given the rapid rise in associate and non-clinical roles within the NHS Talking Therapies and more widely within the privatized and digitalized therapy sector this fundamentally stands to undermine professional standards further rather than protect them.

### **4. Failure to address the future of therapeutic professions**

The counselling and psychotherapy employment landscape will continue to be shaped heavily by the emergence of digital services, including within the NHS as well as the rapid growth of online therapy platforms and employment assistance programmes<sup>4</sup>. We can anticipate the emergence of large and new digital providers and online therapy platforms as key providers in the UK. This platformisation of work raises with it issues of work intensification, standardization, patient confidentiality, data protection and workplace surveillance which will need to be managed both at individual and professional levels<sup>5</sup>. None of this is addressed in the SCoPEd proposal.

### **5. Failure to protect the standing of the profession**

In the two CTUK reports we outline in some detail the attempts to block debate with membership and more broadly in the sector about the introduction of SCoPEd. It resulted in SCoPEd being passed on the basis of a membership consultation within three professional bodies who drove the its adoption engaging with just 13-15% of their memberships. Emerging public concerns about professional standards in the therapy sector with the Cass Review and closure of the Tavistock's GIDS unit<sup>6</sup> and increasing

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<sup>3</sup> Jackson & Rizq (2019) *The Industrialisation of Care: Counselling, Psychotherapy and the impact of IAPT*. PCCS Books.

<sup>4</sup> BBCRadio4 File on Four investigating EAPs <https://www.bbc.co.uk/programmes/m001x4lk> and <https://www.bbc.com/news/uk-68537252>

<sup>5</sup> Cotton E (2024) *UberTherapy: The new business of mental health*. Bristol University Press (Forthcoming)

<sup>6</sup> <https://cass.independent-review.uk/home/publications/final-report/>

press interest in the performance data of NHS Talking Therapies<sup>7</sup> requires a robust and credible defence of the therapy profession. The lack of consultation with members of the professional bodies, and the subsequent governance issues within the professional bodies<sup>8</sup> are serious and visible both within the profession<sup>9</sup> and more broadly in society have profoundly undermined the credibility of our sector.

As it stands SCoPEd has deepened existing professional splits and degradation of counselling and psychotherapy. The lack of consultation during its creation has served to further undermine our professional credibility and it is in this context we urge the professional bodies to engage in an informed debate with their own memberships.

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<sup>7</sup> <https://www.dailymail.co.uk/health/article-13231553/mental-health-sickness-work-therapy.html>

<sup>8</sup> Pilgrim D (2022) British Psychology in Crisis. Pilgrim.

<sup>9</sup> <https://www.partnersforcounsellingandpsychotherapy.co.uk/bacp-refuses-to-reveal-any-information-about-review-of-their-governance/>