

RESPONDING WELL TO VICTIMS AND SURVIVORS OF ABUSE:

Help guide: Therapeutic support – Provider registration

1. The [“Responding Well to Victims and Survivors of Abuse” Guidance](#) states that Church Bodies must provide therapeutic support for victims and survivors of church-related abuse. The Guidance makes it a requirement for Church Bodies to ensure that: “The person providing the therapeutic support must have appropriate qualifications and must be registered with the requisite professional body.” ([Section 4](#)). Although not a bespoke requirement in the Guidance, Church Bodies should also ensure that professionals providing support have the appropriate knowledge of trauma (and trauma-informed approaches) and experience of working with victims and survivors of abuse.
2. This help guide aims to provide further advice on the difference between registration and accreditation for therapy providers, to support Church Bodies in the delivery of these requirements. It also explains the difference between regulated and non-regulated professionals. This guide is **not** part of the House of Bishops’ Guidance and is provided as **supplementary information** only.

Regulated and non-regulated professions

3. A regulated profession refers to a profession for which there is a legal requirement to have certain qualifications or experience in order to undertake certain professional activities or use a protected professional job title. In the UK, for professions within the health and social care sector, the principal regulatory body is the [Health & Care Professions Council](#) (HCPC). The Council:
 - sets the [standards](#) for education, training and practice;
 - keeps a [register](#) of all the regulated professionals; and
 - takes action if regulated professionals do not meet the required standards.

Our Values

4. The HCPC regulates a limited number of professions focused on the provision of therapy, counselling and other psychology-related services. These are: “arts therapist”, “practitioner psychologist”, “clinical psychologist”, “counselling psychologist”, “educational psychologist”, “sport and exercise psychologist”, “registered psychologist”, “forensic psychologist”, “health psychologist” and “occupational psychologist”. Anyone using one of these protected titles must be registered with the HCPC and meet their standards.
5. To check if a provider / individual in a regulated profession is registered with the HCPC, Church Bodies can access the [HCPC Register](#). It is a criminal offence for an individual to use one of the protected titles but not be, or falsely claim to be, on the Register, as well as to falsely claim to have qualifications required for a regulated profession. Any concerns regarding providers / individuals in regulated professions should be raised with the HCPC.
6. The job titles “psychologist”, “counsellor”, “therapist” and “psychotherapist” are not covered by national regulation. This means that anyone can practice using those titles. Where a professional does not hold one of the HCPC regulated professional titles, they have the option to register and / or seek accreditation from a different professional body and be included in a voluntary register. The [Professional Standards Authority](#) (PSA) holds a list of [accredited professional bodies that maintain voluntary registers](#). This includes organisations that have been independently assessed by the PSA against their own [standards](#), to ensure that they are committed to protecting the public and working to good practice. An individual in a regulated profession, who is registered with the HCPC, can also choose to be on a voluntary register – but not all professionals on voluntary registers are registered with the HCPC, as some are not in regulated professions.
7. An individual without accreditation or registration (either with HCPC or on a voluntary register) has no proof of being subject to, and meeting, ethical, professional conduct and quality standards that are recognised within the profession. It is for this reason that the Church of England requires that Church Bodies only engage with registered

practitioners when offering support to victims and survivors of abuse. Unregistered providers should not be used under any circumstance. If no registered provider is available in an area, a Church Body should consider providing therapy or counselling through the use of online platforms.

8. For the avoidance of doubt, the Church of England does not prioritise the use of HCPC - registered providers (e.g. clinical psychologists) and recognises that in many cases a therapist / counsellor registered on a voluntary register may have a more suited specialism, skillset and / or experience.

Registration for non-regulated professionals

9. Although there is considerable variation between professional bodies, registration on a voluntary register is generally an indication that a professional meets the minimum requirements for training and safe and ethical practice, whilst accreditation is an indication that a practitioner has undertaken additional training, has practiced for longer and / or has had a higher level of scrutiny applied to the quality of their practice. Professional bodies use different terms when referring to these two processes – some make a clear distinction between registration and accreditation, others present the two as different steps of the same process (e.g. the [UK Council for Psychotherapy](#) has a “trainee membership” for individuals in their last years of training, followed by a “full clinical membership”).
10. Registration is achieved by a professional upon completing a suitably robust and recognised training course and qualification. Requirements for registration vary across different professional bodies. Some of the most widely recognised professional bodies are: the [British Association for Counselling and Psychotherapy](#) (BACP), the [British Psychological Society](#) (BPS), the [UK Council for Psychotherapy](#) (UKCP) and [Counselling & Psychotherapy in Scotland](#) (COSCA).
11. When working with victims and survivors of church-related abuse, one of the key aspects that may be different to a secular environment is the role of faith. This can

take different dimensions – from faith as a protective factor, to the impact that abuse within a Church setting has on someone’s faith (e.g. questions about forgiveness) and the harmful misuse of Biblical texts and other faith aspects (i.e. spiritual abuse). Whether a survivor wishes to receive support from a Christian counsellor, who has an understanding of the Christian faith and may be able to support them explore some of these issues, is a personal choice. Church Bodies should check a survivor’s preference in that respect prior to arranging therapy. It is important, however, to highlight that what it means to be a “Christian counsellor” can be varied. Providing therapy as a Christian counsellor is not a substitute for suitable training and appropriate registration. The most well-known professional body for Christian counsellors, that upholds high standards and is on the [PSA list](#), is [the Association of Christians in Counselling and Linked Professions](#) (ACC).

12. All the professional bodies listed above hold their own registers of professionals who have met the registration requirements. These can be found on their websites. Church Bodies can also use the PSA list of [accredited professional bodies that maintain voluntary registers](#), in order to search for specific registers (for instance, if a Church Body is looking to arrange access to a specific type of therapy).
13. Church Bodies are generally advised to avoid the use of professionals who are not registered with one of the professionals bodies recognised by the PSA. In exceptional circumstances (for instance, if a survivor is already engaging with a therapist and their preference is to continue with the same therapist), the Church Body may decide to use the services of a therapist or counsellor registered with a professional body that is not recognised by the PSA. However, this should only be agreed after the Church Body has:
 - asked the professional to provide details of their registration or accreditation;
 - sought a rationale from the professional as to why they chose not be registered with one of the more well-known and recognised professional bodies;

- used the details provided to check the specific requirements around training, experience, ethics, professional conduct and safe practice that the professional has had, and continues to, have to meet; and
- sought references from the professional (e.g. from past employers) or from other Church Bodies or organisations that have used the professional's services in the past.

Accreditation for non-regulated professionals

14. Accreditation, generally, follows registration and most professional bodies require providers / professionals to be registered when applying for accreditation. Some professional bodies only refer to “accreditation” and see registration as simply a step or requirement towards achieving accreditation (not an endpoint in itself). As earlier mentioned, other professional bodies do not use the terms “registration” and “accreditation” (e.g. UKCP).

15. Although requirements differ between various professional bodies, accreditation is generally an indication that a professional has completed additional training, has a certain level of experience and / or has had a higher level of scrutiny applied to their practice. For instance, [BACP](#) requires registered professionals to meet higher standards of training, competence and experience in order to gain accreditation. This includes: completing 450 hours of training and a supervised placement whilst in training (with a robust end assessment), having at least 3 years of experience, completing 450 hours of supervised practice, and meeting all the BACP ethical, professional conduct and practice standards.

Trainee counsellors

16. Some agencies or providers may recruit trainees. Generally, those agencies or providers will have their own systems in place to ensure that a trainee is practicing at a high enough level and is appropriately supported and supervised. Such services

might also carry out more robust needs assessment and matching exercises, to ensure that a trainee's experience and competence matches a client's needs.

17. The use of agencies and trainees is acceptable. However, Church Bodies are advised to check with the agency or the provider the specific arrangements that they have in place for deploying trainees, including safeguards such as needs assessment and matching methodologies and the level of professional supervision. Church Bodies should also ensure that they are clear on the training stage of a trainee, their experience of working with victims and survivors of abuse and their knowledge and understanding of trauma and trauma-informed practice, prior to agreeing to the trainee being assigned to provide support to a victim or survivor. In making this assessment, the Church Body may reach out to specialists (e.g. a Church Body may have a Head of Counselling who can provide advice) or seek to obtain references from other Church Bodies or other organisations that have used the services of that agency or of the trainee in the past. The respective survivor should also be informed that therapy will be provided by a trainee and asked if they are content with this arrangement – some survivors may not welcome the use of trainees and may interpret this as the Church not taking their needs seriously.

The SCoPEd Framework

18. A number of registration bodies have been working together over the recent years to develop a shared framework for core training, practice and competence requirements for counsellors and psychotherapists working with adults. This is known as the SCoPEd Framework. The registration bodies who have developed and agreed to move towards implementing the framework are: the ACC, the BACP, the UKCP, the [British Psychoanalytic Council](#), the [Human Givens Institute](#) and the [National Counselling Society](#).

19. The [latest version of the framework](#) was published in January 2022 and proposes a set of standards and requirements which, when implemented, will lead to a greater degree of standardisation and clarity for training and practice requirements in the

sector. The registration bodies involved in this work are currently working together to implement the framework. Church Bodies should visit the [BACP website](#) for updates on this project, as registration requirements for the specific registration bodies involved may soon start to shift to align with the framework.

Pre-trial therapy

20. If a criminal justice process is underway and / or the victim or survivor that a Church Body works with is likely to raise a civil complaint, it is essential that any therapy or counselling provided follows the Crown Prosecution Service guidance on [pre-trial therapy](#).

Flowchart for meeting the therapy provider registration requirement

21. Given the diverse and complex landscape of professionals and regulatory, registration and accreditation bodies, a flowchart is provided together with this help guide to support Church Bodies. These tools will hopefully support Church Bodies in ensuring that any victim or survivor who requests therapeutic support through the Church gains access to appropriately-qualified and registered professionals, who follow the highest standards of professional conduct and practice.

Recommended further reading:

Health & Care Professions Council, “Understanding the regulation of psychologists”. Retrieved on 4 August 2023. Available [here](#).