

Health Education England

NHS Funding for Psychological Professions Training Programmes



A guidance document for policy implementation across England

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1.0 Introduction

1.1 Purpose

The document provides guidance on Health Education England's expectations for the implementation of the '2-year funding rule policy' for NHS-funded psychological professions training programmes. The guidance is primarily a resource for higher education institute training providers, employers and HEE teams to support the policy implementation.

The information included in this guide is as accurate as possible at the time of publication. The policy guidance will be regularly reviewed with stakeholders on a 6 monthly basis to ensure it reflects changes and it remains relevant and effective.

Feedback or queries in relation to the content of this guide should be submitted by email to: mentalhealth@hee.nhs.uk.

1.2 Background Information

The NHS Long Term Plan, alongside the growth of Mental Health Support Teams (MHST) for schools, requires an unprecedented growth in the psychological professions. It is anticipated that this workforce of psychologists, psychological therapists, and psychological practitioners needs to grow by over 60% from the 2019 baseline by 2024, contributing a third of the overall growth required in the mental health workforce.

Over the past fifteen years, there has been a radical development of new psychological professions roles. Where 90% of psychological professionals were clinical psychologists, this is now nearer 40%, with the growth of a wide range of psychological therapist and psychological practitioner roles.

These roles are making a very important impact for the public, working in NHS Talking Therapies (Improving Access to Psychological Therapies) services, Children and Young People's Mental Health, Adult Community Mental Health, Perinatal Mental Health and beyond.

However, the diversification of the workforce has led to an unintended consequence. Due to the current models of psychological professions training, it is perceived that training in one of the newer roles is a desirable route to progress rapidly into another training programme.

This is because the higher pay band practitioner psychologist training positions (i.e., clinical psychology, counselling psychology, forensic psychology and health psychology) often require clinical experience for entry to training. One way individuals have been gaining this experience is by undertaking other NHS funded training for different roles (e.g., Psychological Wellbeing Practitioner in Improving Access to Psychological Therapies (IAPT) services).

Until the introduction of this policy there was nothing (outside of IAPT) to stop individuals starting on one HEE commissioned training but moving to another before even finishing the first. This policy is intended to contribute to a more managed progression approach. This includes taking wider action to support retention within roles, to offer progression routes within a role, and to conduct a review of recruitment processes for clinical psychology, in particular.

2.0 The Policy: 2-year Psychological Professions Funding Rule

In August 2021, HEE made an initial announcement about implementing a policy change for future eligibility on NHS funding across specific psychological professions' training programmes for individuals who wish to undertake more than one NHS-funded training.

The 2-year psychological professions funding rule policy was implemented from the 1 April 2022 and applies to any person starting on one of the NHS-funded psychological professions training programmes (see below) from the 1 April 2022.

In other words, if entering one training from April 2022, that trainee will normally not be eligible to receive NHS funding for a subsequent psychological professions training until a minimum of 2 years after the award for the first training is recommended by a qualifying examination board or by chair's action after the qualifying exam board.

This policy should now be implemented across all NHS-funded psychological professions training programmes.

The Policy: 2-year Psychological Professions Funding Rule

The '2-year psychological professions funding rule' is based on the principle that once an individual has commenced an NHS-funded psychological professions training programme, a 2-year period will be required to pass from the expected completion date of that training before the funded individual would be eligible for further NHS funding to train in another psychological profession training (where this leads to a change of occupation).

Notes:

- 1. The 2-year timeframe is taken from the date of the qualifying exam board (or the date individual award is formally recommended by chair's action post-exam board) of one course to the start date for teaching of the next course to be undertaken.
- 2. The rule applies to any individual who starts and subsequently completes, withdraws or fails to complete the qualifying requirements of a training programme.

Refer to <u>section 5.0 for withdrawal or failure to complete a psychological professions training</u> programme. Refer to section 8.0 for the exceptional circumstances process.

2.1 Pre-existing IAPT training policy

In September 2018, the IAPT Education and Training Expert Reference Group established a 2-year rule for Psychological Wellbeing Practitioners (PWP) seeking to undertake training in High Intensity Cognitive Behavioural Therapy (referred to as HIT below) training. This was published in the <u>Position Statement on Recruitment of IAPT Trainees (September 2018)</u>:

2. Progression from PWP to HIT training

2.1 Health Education England (HEE) commissioners consider progression from PWP to HIT training an integrated training pathway within which PWPs are eligible to apply for HIT training when they have completed a minimum of two years of employment as a PWP after passing all PWP course requirements at internal exam board. HEE will not fund trainees who do not meet this requirement.

The only exception to this two-year rule is if a PWP holds a previous core professional qualification recognised by the <u>British Association for Behavioural and Cognitive Psychotherapies (BABCP)</u>. All advertising and recruitment materials should reflect the commissioners' two-year rule.

The 'Progression from PWP to HIT' training rule (2018) will continue to apply.

Box 1. Application of the 2-year rule for PWPs who started training from September 2018.

Example 1: An individual who started a Psychological Wellbeing Practitioner training programme from September 2018 and wanted to train in High Intensity Cognitive Behavioural Therapy, would be eligible for NHS funding after a 2-year period has passed from the qualifying exam board, or the post-exam board date when the individual award was formally recommended by Chair's action for the Psychological Wellbeing Practitioner training.

Example 2. An individual who started a Psychological Wellbeing Practitioner training programme from September 2018 **and** holds a previous <u>core professional qualification recognised by the British Association for Behavioural and Cognitive Psychotherapies (BABCP)</u>, would be eligible at any time after finishing their Psychological Wellbeing Practitioner training for NHS funding of High Intensity Cognitive Behavioural Therapy training only. The 2-year timeframe would apply, as per the policy, to any other NHS-funded psychological professions training programme.

2.1 Rationale for the policy

The 2-year psychological professions funding rule policy is necessary to meet the expansion ambitions for the NHS workforce. This will ensure the delivery of high-quality services for the public and support services to maintain a stable, experienced workforce.

It is vital that NHS-funded training for specific roles is directed to those who wish to practice that role for a period of time. This will protect taxpayers' investment, ensure that staff in these roles gain experience after qualification and provide the best possible service for patients.

As the psychological professions workforce continues to expand, there are now many types of psychological professions roles, each contributing to health and care in their own right.

These rapidly expanding newer roles, such as Psychological Wellbeing Practitioners (PWPs), Children's Wellbeing Practitioners (CWPs), Education Mental Health Practitioners (EMHPs), Mental Health and Wellbeing Practitioners (MHWPs) and Youth Intensive Psychological Practitioners (YIPPs) provide the public with increased access to psychological healthcare.

The training for these, and some other psychological professions roles, is fully NHS-funded, and trainees may receive a salary during training. Usually, during recruitment to these posts, there is a discussion about an expectation to continue in the qualified role.

On successful completion of the training, it is the expectation from HEE and NHS England, that trainees in some of these occupations should be offered a permanent contract in the organisation. The public investment is designed to expand the workforce in these occupations. NHS England and HEE's relevant guidance should be followed.

It is key that funded training leads to a suitable period of practice. The wellbeing of our workforce is a priority and must be robustly supported, alongside effective management of career pathways, so that people with the right skills and knowledge can be retained to continue to provide excellent high-quality care.

2.2 Frequently Asked Questions

HEE have produced a set of answers to frequently asked questions (FAQs). HEE will aim to keep these FAQs updated on the <u>HEE Psychological Professions webpage</u>.

3.0 NHS-Funded Psychological Professions Training Programmes

3.1 Training programmes included

The list of training programmes included within the policy (where NHS-funded) will be updated periodically. This means additional NHS-funded training programmes may be added to this list. HEE will give prior notice to any additional programmes and inform stakeholders and partners before these training programmes are advertised and recruited to.

The NHS-funded psychological professions training programmes included in this policy are:

- Adult Psychotherapy
- Associate Psychological Practitioner
- Child and Adolescent Psychotherapy
- Children's Wellbeing Practitioner
- Clinical Associate in Psychology (apprenticeship)
- Clinical Psychology
- Cognitive Behavioural Therapy
- Core counselling training (including the three-year IAPT Psychotherapeutic Counselling Training)
- Counselling Psychology*
- Dialectical Behaviour Therapy
- Education Mental Health Practitioner
- Family and Systemic Psychotherapy (qualifying level)
- Forensic Psychology
- Health Psychology

- Mental Health and Wellbeing Practitioner
- Psychological Wellbeing Practitioner** (including apprenticeship)
- Youth Intensive Psychological Practitioner

Notes:

*Counselling Psychology is not currently NHS-funded.

** Psychological Wellbeing Practitioners - The 'Progression from PWP to HIT training' rule (2018) will continue to apply to Psychological Wellbeing Practitioners who started training from September 2018. (See section 2.1).

4.0 No retrospective application of the 2-year Psychological Professions Funding Rule

4.1 No retrospective application before 1 April 2022

Following the initial publication of the policy in August 2021, HEE undertook an extensive engagement process with stakeholders and as a result, in September 2021, HEE paused and revised the policy.

HEE announced there would be **no** 'retrospective' application of the policy to individuals who started one of the affected NHS-funded psychological professions training programmes by 1 April 2022 (although existing restrictions on transition from Psychological Wellbeing Practitioners to High Intensity Cognitive Behavioural Therapy training were retained)¹.

Box 2. Examples of pre-1 April 2022 application

Example 1: An individual who started an NHS-funded psychological professions training programme (for example, Clinical Associate in Psychology apprenticeship, Children's Wellbeing Practitioner, or Mental Health Wellbeing Practitioner training) before the 1 April 2022, would be eligible for NHS funding if they were offered a place on a Doctorate in Clinical Psychology training programme starting in the 2023 or 2024 academic years

Example 2: An individual who started a Cognitive Behavioural Therapy training programme before the 1 April 2022, would be eligible at any time after finishing their training for NHS funding for a second psychological professions training programme, such as Family and Systemic Psychotherapy.

Example 3: An individual who started a Psychological Wellbeing Practitioner training programme before 1 April 2022, would be eligible at any time after finishing their training for NHS funding for a second psychological professions training (except High Intensity Cognitive Behavioural Therapy), such as Clinical Psychology training.

Example 4: An individual who started a Mental Health and Wellbeing Practitioner training programme before the 1 April 2022, would be eligible at any time after finishing their training for NHS funding for a second NHS-funded psychological professions training programme, such as High Intensity Cognitive Behavioural Therapy or Family and Systemic Psychotherapy.

¹ Psychological Wellbeing Practitioners (PWP) - The 'Progression from PWP to HIT training' rule (2018) will continue to apply to Psychological Wellbeing Practitioners who started training from September 2018. See section 2.1.

5.0 Application of the 2-year Psychological Professions Funding Rule (from 1 April 2022)

The 2-year psychological professions funding rule policy was implemented from the 1 April 2022 and applies to any individual starting on one of the NHS-funded psychological professions training programmes from the 1 April 2022.

In many cases, undertaking further NHS-funded training within the 2-year period will require a change of occupation from one psychological profession to another. The 2-year psychological professions funding policy will always apply when an individual seeks to undertake a second NHS-funded psychological professions training programme, and this would result in a change of occupation from one psychological profession to another.

For example, Psychological Wellbeing Practitioner to Dialectical Behaviour Therapist, Education Mental Health Practitioner to Clinical Psychologist, or Clinical Associate in Psychology to Cognitive Behavioural Therapist.

5.1 Assessing eligibility for an NHS-funded psychological professions training programme

- **5.1.1** All applicants for an NHS-funded psychological professions training programme should complete a self-declaration during the initial application process. The applicant is responsible for disclosing if they have ever attended an NHS-funded psychological professions training programme. Information requested may include the previous training programmes <u>start date</u>, <u>qualifying date</u>, non-completion reasons such as withdrawal or failure, and if the funding rule applied as per this policy.
- **5.1.2** Eligibility should be reconfirmed at the interview stage and an applicant may be requested to provide relevant documentation and/or references from the original training provider and employer to confirm the application of extenuating circumstances (see section 8.0).
- **5.1.3** Failure to disclose accurately previous training would normally be considered <u>fraud</u> (<u>Fraud Act 2006, section 3</u>), which would typically be considered gross misconduct by training providers and employers.

5.2 Application of the 2-year psychological profession funding rule for specific training programmes

- **5.2.1** HEE funds a number of Cognitive Behavioural Therapy and Dialectical Behaviour Therapy training courses that can be undertaken as a full training (for example, 2-year post graduate diploma) or as an NHS-funded "top-up" (one year; second year only specialised area training) for those with specific existing competencies.
- **5.2.2** All Cognitive Behavioural Therapy and Dialectical Behaviour Therapy courses comprising at least one year of training, usually at postgraduate level, are in scope of the 2-year psychological professions funding rule (including Improving Access to Psychological Therapies (IAPT), Psychological Therapies for Severe Mental Health Problems (PT-SMHP) and Children and Young People's IAPT Cognitive Behavioural Therapy training).

Shorter, introductory Cognitive Behavioural Therapy and Dialectical Behaviour Therapy courses that do not lead to a change of occupation are out of scope.

5.3 Part-time training programmes

- **5.3.1** The 2-year rule applies to any individual who starts an NHS-funded psychological professions training programme on a part-time basis. The usual extenuating circumstances process would apply if relevant (see section 8.0).
- **5.3.2** An individual who has received approval from their training provider and employer (as per their policies and procedures) to change from full time to part-time training, may be considered under the <u>'extenuating circumstances' process</u>. Reasons may be related to (but not limited to) one of the protected characteristics, or other reasons such as long-term absence/sick leave (unrelated to a disability), or carers leave.

5.4 Withdrawal or failure to complete a psychological professions training programme

- **5.4.1** HEE do not support and will not fund repetition of training (at the same or another higher education institute) if an individual has completed the training and failed or has been removed from the training because of academic or other misconduct.
- **5.4.2** Individuals who have previously withdrawn from a psychological professions training programme (at the same or another training provider) will only be supported by NHS funding if:
 - 1. A 2-year period has passed from the expected date of the qualifying exam board of the training programme they withdrew from, or
 - 2. the applicant declares (in the initial application process) that they withdrew from a prior training programme and that the withdrawal was due to extenuating circumstances, and
 - a. the recruiting training provider and recruiting employer are satisfied by references from the original training provider and employer, which taken together indicate that there are clear extenuating circumstances which would suggest that a repetition of training would be good use of public money.

See 8.0 Application of 'extenuating circumstances' process within the NHS-funded psychological professions training programme policy.

5.5 Self-funded psychological professions training programmes

The 2-year psychological professions funding rule does not apply when an individual <u>self-funds</u> a psychological professions training programme independently, including via student loans, which are repaid by the individual.

Box 3. Examples of when the 2-year rule does not apply

Example 7: An individual who started an NHS-funded psychological professions training programme (for example, Children's Wellbeing Practitioner, or Mental Health Wellbeing Practitioner training), would be able to apply and undertake a self-funded psychological professions training programme, such as Cognitive Behavioural Therapy, Family and Systemic Psychotherapy, or Counselling Psychology at any time.

6.0 Exemptions and application of the policy to 'upskilling' training programmes

This section outlines the specific training programmes that are exempt from the 2-year psychological professions training rule, and the application of the rule on the basis of upskilling. The list of training programmes eligible for exemptions within the policy (where NHS-funded) will be updated periodically.

6.1 Specific training programme exemptions

The following training programmes are exempt from the 2-year psychological professions training rule:

6.1.1 NHS-funded Pre-clinical Child and Adolescent Psychotherapy training

An individual may undertake the NHS-funded Pre-clinical Child and Adolescent Psychotherapy training and will not have to wait a further two years before being eligible for NHS funding (if offered a place) for the Doctorate in Child and Adolescent Psychotherapy training programme.

This will enable the current expansion plans for Child and Adolescent clinical training.

6.1.2 Supervisor training (across all the psychological professions)

Psychological professions supervisor training programmes are not included in the 2-year funding rule as these do not result in a change in occupation. An individual can undertake supervisor training and will not have to wait a further two years before being eligible to undertake another NHS-funded psychological profession's training programme.

6.2 Exemptions on the basis of 'upskilling'

An exemption may be applied where undertaking a second NHS-funded psychological professions training from the list of included programmes **does not** result in a change in professional occupation. This second psychological training can therefore be considered 'upskilling'. This means the new skills and competencies can be applied by the practitioner within their existing occupation and national guidelines do not require a change of occupational role to do so.

6.2.1 The 2-year psychological professions funding policy then applies to any second 'upskilling' NHS-funded psychological professions training.

Box 4. Example of exemption on the basis of 'upskilling'

Example 8a: Following completion of a Doctorate in Clinical Psychology, a Clinical Psychologist may undertake training at any time in Cognitive Behavioural Therapy or Family and Systemic Psychotherapy. Upskilling in these courses does not result in a change of occupation.

Box 5. Examples of 'second upskilling' application of the 2-year rule

Example 8b: The Clinical Psychologist that completed a first 'upskilling' in Cognitive Behavioural Therapy, would normally not be eligible for a second 'upskilling' training (for example, Family and Systemic Psychotherapy) until 2-years after the date of the qualifying exam board, or the post-exam board date that the individual award is formally recommended by Chair's action for the first upskilling training programme.

Example 9: A nurse or social worker may undertake training in Family and Systemic Therapy and deliver family therapy within their nurse or social worker role. The individual would then normally not be eligible for a second NHS-funded psychological professions training (for example, Cognitive Behavioural Therapy) until the 2-year period has passed from the date of the qualifying exam board, or the post-exam board date that the individual award is formally recommended by Chair's action, of the first 'upskilling' training.

7.0 Equality Impact Analysis

The Equality Impact Analysis (EIA) has been conducted by HEE's National Mental Health Programme.

In summary, the analysis in <u>Appendix 9.1, Table 1 Equality Impact Analysis Summary</u> identifies several impacts that may require an individuals' exemption from the policy change either whilst they are on training programme or after they have successfully completed the programme.

8.0 Application of 'extenuating circumstances' process within the policy

The application of the 'extenuating circumstances' process may be considered for reasons related to (but not limited to) one of the protected characteristics, or other reasons such as long-term absence/sick leave (unrelated to a disability), or carers leave, where a trainee has been:

- Unable to attend the training programme for a period of time
- Unable to complete the course requirements within the expected programme delivery period
- Has withdrawn from a training programme
- Has had no option but to extend training over a longer period than would otherwise have been possible

The recruiting employer, with support from the recruiting training provider, is responsible for assessing and determining the eligibility of a trainee on an NHS-funded psychological

professions training programme under the 'extenuating circumstances' process². Outcomes should be reported by training providers as part of contract management processes.

(i) HEE would recommend that where delays to completion or withdrawals occur for reasons that may later be considered in an extenuating circumstances process, the employer **and** training provider provide the trainee (if requested by the trainee) with references confirming reasons for the delay / deferral / withdrawal.

8.1 Implications of applying the 'extenuating circumstances'

The application of extenuating circumstances exceptions to the policy is at the training providers'/employers' discretion within the requirements of the Equality Act 2010 and the training provider's/employer's policy and procedures. Appeals against these decisions may be made on grounds of incorrect application of procedure through the relevant complaints process with the training provider and/or employer.

8.1.1 Delay to completion of qualifying requirements of the training programme

- Where a trainee is delayed in completing a training programme due to 'extenuating circumstances', the start date of the 2-year period may be applied from the originally expected date of the qualifying exam board, or the post-exam board date that the individual award is formally recommended by Chair's action.
- Trainees in this situation may be eligible for another NHS-funded psychological professions training programme from the date of the exam board when they would have originally qualified if extenuating circumstances had not arisen.

8.1.2 Withdrawal from a training programme

If a trainee needs to withdraw from a training programme due to, but not limited to, a reason related to one of the protected characteristics within the requirements of the Equality Act 2010, and/or the removal of any disadvantage through any protected characteristic, and:

- If the trainee has **not** applied for another NHS-funded psychological professions training programme prior to their withdrawal, then the trainee may be eligible for NHS funding of a second psychological professions training course and the 2-year period may not apply.
- If a trainee had applied for another NHS-funded psychological professions training prior
 to withdrawing from the first training programme, they would not be eligible for NHSfunding for the second psychological professions training programme, even if extenuating
 circumstances were applicable.

² For some training programmes, training providers act formally to recruit on behalf of the employer. In this case the training provider is responsible for operating the extenuating circumstances process.

8.2 Extenuating circumstances for consideration

The list of reasons for consideration under the 'extenuating circumstances' process will be revised and updated periodically. The application of the 'extenuating circumstances' process may be considered for one of the following reasons:

- Disability, <u>long-term absence</u>³ or time out of post for other reasons related to long-term illness or disability
- Gender reassignment leave
- Pregnancy, maternity, paternity and adoption leave
- Carers leave
- **8.2.1** In the circumstances of long-term absence, or time out of post for other reasons related to one of the reasons above, and this resulting in a trainee being delayed or unable to complete the qualifying requirements of the course within the scheduled training timeframe. The training provider/ employer is responsible for managing and supporting the trainee as per their sickness and/or attendance management policies.
- **8.2.2** Where a trainee is required to re-register in order to complete the training, this should be supported via the HEE contract management process.
- **8.2.3** Applications to a second training requiring a change in occupation may be considered for exemption in relation to potential extenuating circumstances linked to the delay or inability to complete the earlier programme. In this case, the date at which completion of the first programme was expected before the extenuating circumstances interfered could be taken as the start of the 2-year period.
- **8.2.4** Later applications may be considered in relation to potential extenuating circumstances linked to the delay or inability to complete the earlier programme.

Box 6. Examples of extenuating circumstances for consideration

Example 10: An individual started an NHS-funded psychological professions training programme and was unable to attend for a continuous period of greater than 28 days. This was due to receiving a diagnosis and needing to undertake a treatment plan. Upon return, the trainee was able to 'catch up' on the course work and, by agreement, completed clinical requirements over a period of 2-months after the course completion date. There was a delay of 2-months to their confirmed 'exam board' date, or the post-exam board date that the individual award was formally recommended by Chair's action.

Application: The extenuating circumstances can be considered for application under 8.1.1 Delay to completion of qualifying requirements of the training programme. The individual would be eligible for another NHS-funded psychological professions' training programme from the date of the exam board they would have been expected to be confirmed qualified had they not required an extension.

³ Long term absence is any absence, or periods of absence that are for a period of 28 calendar days or more in duration due to incapability. Any reference to long-term absences due to illness also includes absence due to injury.

Example 11: An individual started an NHS-funded psychological professions training programme and took several periodic short-term absences (e.g., less than 1 week) over the course of their 12-month training due to managing their disability or a long-term physical and/or mental health condition. The trainee was unable to complete the course requirements within the usual 12-month timeframe of the course. Reasonable adjustments needs were assessed and implemented to support the trainee to continue. It was agreed for the trainee to complete the remaining components of training part-time over an extended period of an additional 6-months (i.e., 18-months in total).

Application: The extenuating circumstances can be considered for application under 8.1.1 Delay to completion of qualifying requirements of the training programme. The individual would be eligible for another NHS-funded psychological professions training programme from the date of the exam board they would have been expected to be confirmed qualified if completed within 12-months.

Example 12: An individual started an NHS-funded psychological professions training programme and withdrew part-way through the course due to carer responsibilities and being unable to complete the course and clinical requirements. The individual had not applied for another NHS-funded psychological professions training programme at the time of withdrawal confirmation.

Application: The application of the extenuating circumstances process can be considered under 8.1.2 Withdrawal from a training programme. The trainee may be eligible for NHS funding of a second psychological professions training course and the 2-year period does not apply.

Example 13: An individual started an NHS-funded psychological professions training programme, has applied for a second NHS-funded Psychological Professions training programme and subsequently withdrawn from the first training programme.

Application: The individual would not be eligible for NHS funding of the second training programme until two years after the expected date of the exam board of the training programme withdrawn from.

9. Summary

The 2-year psychological professions funding rule policy was developed to support delivery of the:

- Psychological Professions Workforce Plan for England
- NHS Long Term Plan
- Five Year Forward View for Mental Health
- We are the NHS: People Plan 2020/21
- National Vision for the Psychological Professions

The overall aim is to support the NHS Long Term Plan ambitions for meeting people's mental health needs by ensuring the delivery of high-quality services for the public and protecting taxpayers' investment. The policy will help to ensure that staff who train in one of the NHS-funded psychological profession roles gain experience after qualification and provide the best possible service for patients.

Implementation of the policy requires collaboration and communication between all key stakeholders, including higher education training providers and employers.

10.0 Appendices

10.1 Table 1. Equality Impact Analysis Summary

Characteristics /Groups	Summary of potential impact	Impact summary	Mitigations
Age	Uncertain	Mature individuals later in their career could be impacted by this policy change as they will be unable to progress rapidly across multiple trainings.	Mature individuals will still be able to enter subsequent NHS-funded psychological professions training without a requirement for clinical experience in one of the other psychological occupations.
Disability	Possible negative impact	Individuals may be on sick leave, or time out of post for other reasons related to their disability.	Application of the <u>extenuating circumstances</u> <u>process</u> (If applicable).
			Seek extension of development funding opportunities to support equality, diversity and inclusion initiatives across the protected characteristics to support increasing access and progression within the psychological professions.
Gender reassignment	Possible negative impact	Individuals may be on gender reassignment leave.	Application of the <u>extenuating circumstances</u> <u>process</u> (If applicable).
			Seek extension of development funding opportunities to support equality, diversity and inclusion initiatives across the protected characteristics to support increasing access and progress within the psychological professions.
Marriage Civil Partnership	Neutral or no impact	No anticipated impact.	n/a

Pregnancy and maternity (Including paternity and adoption leave)	Possible negative impact	Individuals who need to take maternity, paternity and adoption leave during the period of the training programme may be impacted due to their ability to complete the training programme by the intended end of course and therefore, expected qualifying exam board, or the postexam board date that the individual award is formally recommended by Chair's action.	Application of the extenuating circumstances process (If applicable).
Race	Possible negative impact	Ethnic minorities are entering the clinical psychology profession roughly in proportion to ethnic minority populations in England and Wales. However, there is historic underrepresentation in the clinical psychology profession which needs to be addressed. There are lower proportions of ethnic minorities entering clinical psychology training than in the undergraduate psychology population, and most ethnic minorities have a lower chance of success in their applications than white British candidates. The change in policy slows down a path that has been perceived as providing a widely available route to paid clinical experience for aspiring clinical psychologists in particular. It has been perceived as helping to redress differential disadvantage to many ethnic minority candidates, because of potential differential inability to undertake voluntary clinical work. However, initial data analysis does not confirm this perception.	Introducing a required timescale on this career path is likely to incentivise psychological professions training programmes to consider other means of removing disadvantage for ethnic minorities – for example, considering whether clinical experience should be dropped as a criterion for selection altogether and recruiting to clinical psychology training programmes direct from undergraduate psychology programmes. All newly commissioned HEE psychological professions training providers are required to outline as part of their bid: "steps that will be taken to address and include wider social mobility, equality, minoritised communities, diversity, and inclusion issues across the curriculum." Seek extension of development funding opportunities to support equality, diversity and inclusion initiatives across the protected characteristics to support increasing access and progress within the psychological professions.

Religion or belief	Neutral or no impact	n/a	n/a
Sex	Possible positive impact for men, possible negative impact for gender neutral/reassi gnment and women	Men are currently under-represented across the psychological professions. See gender reassignment. See maternity and pregnancy.	The policy change is likely to incentivise clinical psychology courses to select more candidates direct from undergraduate psychology courses. This may be a preferred route for male candidates which could positively impact representation.
Sexual orientation	Neutral or no impact	n/a	n/a
Carer's leave	Possible negative impact	Individuals may require time out of post for other reasons related to carer responsibilities.	Application of the extenuating circumstances process (If applicable).
Long-term absence	Possible negative impact	Individuals may require time out of post for reasons related to long-term sickness.	Application of the extenuating circumstances process (If applicable).

10.2 Glossary of Terms

10.2.1 Two-year Psychological Professions Funding Rule

The HEE policy that applies to NHS-funded psychological profession training programmes.

10.2.2 British Association for Behavioural & Cognitive Psychotherapies (BABCP) recognised core professional qualification

The BABCP recognised core professions have had a substantial amount of mental health training and meet accreditation requirements for knowledge and experience in mental health. For the full list visit: BABCP Core Professions List

10.2.3 Equality impact analysis

An Equality Impact Analysis (also known as Equality Impact Assessment) is an evidence-based approach designed to help organisations ensure that their policies, practices, service changes, events and decision-making processes are fair and do not present barriers to participation or disadvantage any protected groups from participation.

10.2.4 Extenuating circumstances

Extenuating circumstances (in the context of this policy) are events that may affect an individual's ability to attend and complete the academic and clinical requirements of a psychological professions training programme within the expected timeframe.

This may be related to one of the protected characteristics, or other factors such as physical or mental illness, injury, bereavement, family circumstances or other personal issues., It is anticipated these events would typically be unforeseen, unpreventable and out of the individual's control.

10.2.5 Fraud by failing to disclose information

The Fraud Act 2006 (legislation.gov.uk) states:

A person is in breach of this section if he -

- (a) dishonestly fails to disclose to another person information which he is under a legal duty to disclose, and
- (b) intends, by failing to disclose the information -
 - (i) to make a gain for himself or another, or
 - (ii) to cause loss to another or to expose another to a risk of loss.

10.2.6 Long term absence

Long term absence is any absence, or periods of absence that are for a period of 28 calendar days or more in duration due to incapability. Any reference to long-term absences due to illness also includes absence due to injury.

10.2.7 NHS-funded

For specific psychological professions training programmes, the NHS may fund some or all aspects of the training programme including tuition fees, clinical placements, salary support, education support and/or training grants.

NHS Education Funding Guide | Health Education England (hee.nhs.uk)

10.2.8 NHS Education Contract

The NHS Education Contract is the contractual mechanism by which HEE entrusts all Education Providers to undertake non-competitive health care education and training activities in England.

10.2.9 Qualifying date

The date of the qualifying exam board or the date individual award was formally recommended by chair's action post-exam board.

10.2.10 Qualifying Exam Board

The qualifying exam board (or the date individual award is formally recommended by chair's action post-exam board) is the date an individual has been formally confirmed by the exam board as having passed all aspects of the programme and achieved the academic award.

10.2.11 Self-Funded

This is where an individual funds an education or training programme independently and includes student loans which are repaid by the individual.

10.2.12 Start date of an NHS-funded psychological professions training

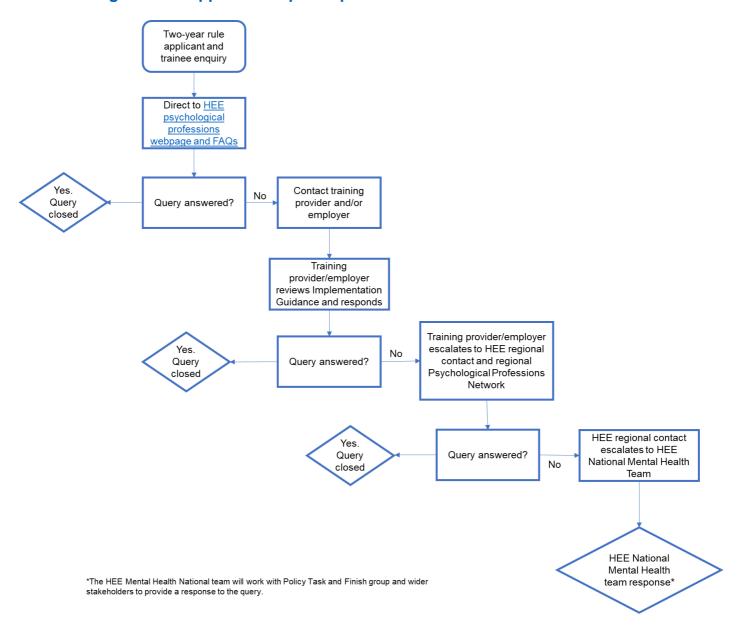
The 'start date' of an NHS-funded psychological professions training programme is taken from the first date of taught content. This does not include pre-course induction days or the date on which employment commenced.

10.2.13 Upskilling

The activity of teaching somebody new skills; the process of learning new skills and competencies (in the context of this policy) without a change of occupation being required to enact those skills.

10.3 Supporting Information

10.3.1 Management of applicant enquiries process



10.3.2 Example marketing copy for recruitment material

If you start an NHS-funded psychological professions training from April 2022, you will normally be unable to access further NHS-funded training for a new occupation in the psychological professions until two years after your qualifying exam board (or the date individual award is formally recommended by chair's action post-exam board).

Visit <u>the funding for psychological professions training programmes webpage</u> for more information about NHS funding.

10.3.3 Example 'self-declaration' question for applicants

The below are examples for use by training providers and employers during the recruitment process. They can be adapted to suit specific requirements.

Example 1: Short form

I confirm that I am eligible for NHS-funding of this training programme [drop box]

Drop box: Yes/ No / I would like to be considered under the extenuating circumstances process

Failure to disclose accurately previous training would normally be considered fraud (<u>Fraud Act 2006</u>, <u>section 3</u>), which would typically be considered gross misconduct by training providers and employers.

Example 2: Detailed form

The 2-year psychological professions funding rule policy was implemented from the 1 April 2022 and applies to any person starting on one of the NHS-funded psychological professions training programmes from the 1 April 2022. For further information about the policy, FAQs and the affected training programmes, visit <u>HEE's website</u>.

- Q1. Have you ever started an NHS-funded psychological professions training programme? Yes/No
- Q2. If yes, please select the psychological professions training programme: [drop box list of affected psychological professions training programmes]
- Q3. Start date of the training programme: [Date box]
- Q4. Date of the qualifying exam board (or the date award was formally recommended by chair's action post-exam board): [Date box]
- Q5. Please provide relevant details for consideration under the extenuating circumstances process: [Free text box]

Relevant documentation and/or references from the original training provider and employer to confirm the application of extenuating circumstances should be provided at interview (if offered). Failure to disclose accurately previous training would normally be considered fraud (<u>Fraud Act 2006, section 3</u>), which would typically be considered gross misconduct by training providers and employers.