



Trainee Educational Psychologists (TEPs): Salary Arrangements for Delayed Completion / HCPC Registration

There is currently no standard practice in local authorities and other employers for TEPs who are nearing the completion of their studies, are starting employment and their salary arrangements. Over the years, potential delays between starting employment and Health Care Professions Council (HCPC) registration have caused issues for many TEPs and 'nearly qualified' Educational Psychologists (EPs).

Background

In order to practise as an Educational Psychologist, a person must be registered with the HCPC. This is a legal requirement. In order to gain registration, a trainee must meet the requirements of the qualification as agreed by the recognised training providers, which are mostly Universities. The date at which a TEP transitions to being recognised as a newly qualified EP can vary depending on course deadlines, completion of work (e.g. theses) and exam boards. Once their course has formally agreed that all requirements for completion have been met, an application for registration with the HCPC may be made. Registration with the HCPC should not take longer than a month.

As TEPs should start their post training employment on 1 September (to preserve any continuous employment) they need to ensure that they are aware of any policy developed by their prospective employer around working between 1 September and the date at which they are deemed qualified and registered.

Starting Work

The AEP recommends that, in normal circumstances, employment following the Doctoral training course should start on 1 September. Notionally, all courses end on 31 August. This start date preserves continuous service (where this is agreed). TEPs should know and understand the requirements for HCPC registration, at which point they will be able to undertake all the duties of a qualified, registered EP. When this has not been possible by 1 September, the PEP (or equivalent) and the TEP should discuss what policy has been agreed in the Local Authority, or other employer, about the transition period between starting work, and obtaining registration.

HCPC Registration

Although TEPs at the end of their training should be able to start work, they must not be referred to as Educational Psychologists until their registration with the HCPC is completed. This is a legal requirement.

A TEP is not an EP, and therefore cannot carry out the full range of duties until they have obtained HCPC registration. Managers should determine what work can still be undertaken, what requires close supervision, and what cannot be done.

Options available in circumstances of delayed registration

1. **Employ as agreed**

This includes undertaking the full job description, pay and conditions as set out in the contract of employment. The lack of registration will mean that additional supervision and sign-off for some work will be required. The TEP will be employed as though they were fully qualified and registered. They will also be paid as per the agreed salary within their contract of employment.

2. **Employ with restrictions on work undertaken:**

There may be some restrictions on the breadth of work undertaken. If so, there should be a clear rationale for decisions made about workload and the impact a reduced role may have on salary. It may be possible for the TEP to undertake work which will need to be supervised fully by a qualified, registered EP. Additional time should be provided to the supervising EP to ensure proper support is provided.

3. **Employ on a different contract than agreed at time of recruitment:**

In some cases, TEPs may be appointed onto a temporary contract, for example, as a Trainee or Assistant Educational Psychologist paid according to that Soulbury scale. In this situation, the TEP should continue to access the same support and carry the same responsibilities as they did when still officially on the course.

It should be noted that there is no requirement for a salary to be reduced while a TEP awaits registration. It is not correct to say that only an EP can be appointed on Soulbury A. An employer is free to appoint people onto any scale they deem appropriate. For example, even if the TEP is undertaking all the required duties, but additional supervision is required, there is no barrier to the employer appointing to the agreed Scale A point.

Should an employer deem it appropriate to offer a reduced salary for the period of time between the start of employment, and the qualification/registration on completion of course requirements, then there needs to be a transparent agreement about the position regarding any repayment of back pay. It is important to consider several matters before deciding if back pay is appropriate. This includes (but is not limited to):

- a) The tasks/responsibilities that have been undertaken during the period of time between employment and qualification.
- b) The reason for the delay in receiving registration. For example, there is a significant difference between a delay caused by the thesis timeline set out by

the course provider and a delay caused by the TEP being unable to complete in time.

c) The length of the delay

Care should be taken to ensure that any decisions are made on non-discriminatory grounds (e.g. maternity, disability).

If back pay is agreed for a limited period of time, there should be a clear rationale behind such a decision. For example, considering the reasons for the delay, and the control that the TEP has had over completion.

Any policy should be clearly communicated to all TEPs at an early stage.

Delays in completion

Hopefully, TEPs will have completed the requirements by 1 September. In the event of a delay, employers have options about how this is dealt with. Our recommendation is that TEPs should discuss the possibility of not completing the qualification and registration by 1 September with their prospective employer at the earliest opportunity.

The delay in registration can be caused by several things:

1. Submission Dates (set by the University/training provider)

Most of the training providers have a submission date which all work should be completed and submitted. This date should be clearly communicated to TEPs, and the potential consequences of not meeting that deadline needs to be understood. If amendments are required, this can delay qualification and registration. Most employers will still be able to agree a starting date of 1 September and will provide conditions for that.

We are aware that some of the training providers' submission dates make it unlikely that completion of formal registration with HCPC will occur by 1 September. It would be reasonable for this to be taken into account when devising policies, e.g. requesting confirmation from the training provider that all work required has been completed.

2. Minor/Major Amendments to a Thesis

Even if a thesis is submitted on time, delays in completion can occur if amendments are needed. As registration cannot be confirmed until these are done, it is our recommendation that TEPs undertake this work as soon as possible.

3. Illness or other delay on the part of the TEP

There are many reasons why a TEP may have difficulty in completion, particularly if there has been significant sickness absence leading to a delay in submission. It is

crucial that TEPs are supported in completing and submitting their thesis and any other outstanding work. Managers may find that they need to build some time into the TEP's time allocation to ensure that they are able to combine their work with the final requirements of the course. This may be one reason for reducing a TEP's salary or employing them on a temporary TEP contract.

Conclusion

In recent years, there has been an increase in the number of TEPs who have struggled to complete course requirements whilst also meeting the needs of the service that they are working for. It is important to ensure that TEPs are properly supported during their training, and also during the period of time after the formal course finishes and they obtain registration. A clear policy should be devised and any member who would like advice on this should contact either their local rep, or email enquiries@aep.org.uk