

Accredited Registers Programme

Accreditation Panel's Decision

Application for accreditation from: UK Association for Humanistic Psychology Practitioners ([UKAHPP](#))

Panel meeting: 17 and 24 April 2018 (**Panel meeting deferred**)

26 July 2018 (**Accreditation granted**)

Accreditation valid from: 7 August 2018 – 7 August 2019

The [Professional Standards Authority](#) accredits registers of people working in a variety of health and social care occupations not regulated by law. To be accredited, organisations holding such registers must prove that they meet our demanding [Standards for Accredited Registers](#) (the Standards). Accreditation is reviewed every twelve months.

The Accreditation Panel reviewed UKAHPP's application form, risk matrix, UKAHPP's query sheet responses and a summary report from the Accreditation team. The Panel had to consider whether UKAHPP met each Standard and decide to **accredit**, **accredit with conditions** or **defer** the application. The Panel could make recommendations in the form of:

- **Conditions** – changes that must be made in order to gain and maintain accreditation. If Conditions are not met within the timeframe specified, accreditation may be removed.
- **Instructions** – actions that would improve practice but do not affect compliance with the Standards and that the Panel requires to be implemented and be satisfied of appropriate implementation within a given timeframe.
- **Learning points** – actions that would benefit the operation of the register, the implementation of which would be verified during the annual review of accreditation.

The Panel considered the range of options available to it when making its decision.

The Panel was provided with a summary report prepared by the Accreditation team. The draft summary report had been provided to UKAHPP prior to the meeting and its comments were incorporated into the report provided to the Panel.

The Panel noted the assessment carried out by the Accreditation team included:

- Documentary review and due diligence checks
- Share your experience responses
- Review of policies and procedures applied in practice, including discussions with the General Secretary, the Chair and the Administrator (equivalent to the site visit)
- Interviews with the Chair, the Membership and Accreditation Committee Chair and the Registrar
- Observation of the February 2017 Board meeting
- Proxy Assessments of complaints.

There were no declarations of interest from members of the Panel. A summary of matters considered by the Panel is set out in the Annex. The summary is not intended to reflect all the matters discussed by the Panel, but to record those that were most important in forming its decision.

Outcome

The initial Panel meeting was held over two days, 17 and 24 April 2018. After careful consideration of the information provided, the Panel was not satisfied that UKAHPP met Standards 7 and 11 and therefore Standards 2 and 5, so deferred its decision. The Panel requested that UKAHPP provide further information by 2 November 2018 as follows:

1. Evidence of the separation between the membership/professional body functions
2. Updated policies and procedures to remove the ratification of decisions by the Board
3. Consideration of whether the Article 4 process is appropriate and required given the other available complaints processes
4. The removal of the Registrar in the appeal of registration decisions process
5. Consideration of whether three complaints processes are required, and if so a clear indication of what each process covers
6. If the Disciplinary Procedure is to be kept, detail on how UKAHPP will separate the following functions: investigation, deciding if there is a case to answer, adjudication and appeal
7. Clear criteria for whether cases that are outside the timeframe and third-party complaints should be taken forward
8. Removal of the conflict of interest arising from the Ethics Committee being responsible for the Ethical Review procedure
9. Removal of the right to a final appeal at the AGM where a decision of the Disciplinary Procedure results in a dismissal order and removal from the register
10. Clarification of the appeals process within the Complaints Procedure, including the remit of the Appeal Panel
11. Clarification of the possible outcomes within the Organisational Complaints Procedure.

UKAHPP provided evidence in response to the above points on 11 July 2018. The Accreditation team produced a summary report of the actions taken which was shared with UKAHPP and its comments incorporated before the summary was sent to the Panel. The Panel reconvened on 26 July 2018 to consider whether it was satisfied with the actions taken by UKAHPP and therefore met the Standards.

The Panel positively noted the work UKAHPP had done to update its policies and procedures in response to the concerns raised by the Panel. The Panel welcomed UKAHPP's positive response. After careful consideration of the information provided, the Panel was satisfied that UKAHPP had addressed the points raised and as a result the Standards were met. The Panel decided to **accredit** UKAHPP's register with Conditions. Accreditation is valid from **7 August 2018** to **7 August 2019**.

Conditions, Instructions and Learning Points

The Panel provided the following **Conditions** to be implemented by the timeframe specified:

1. UKAHPP must update its risk matrix to include more fully all risks, such as remote counselling, and all mitigations, such as training, relevant CPD and adherence to the Codes of Conduct. This should be completed within six months of the date of accreditation
2. UKAHPP must develop quality assurance processes to ensure the information on the public register is accurate. This should be completed within six months of the date of accreditation
3. UKAHPP must review the wording and the practicalities of the Complaints Procedure and the Disciplinary Procedure to ensure that it is clear which process will be used and when. This is to be completed and sent to the Accreditation team within six months of the date of accreditation.

The Panel provided the following **Instructions** to be implemented by annual review of accreditation:

1. UKAHPP is to notify the Authority if it plans to add new occupations, modalities, categories to its register
2. UKAHPP is to add every registrant who meets its standards on the public register, unless there are exceptional circumstances involving the safety of the registrant. UKAHPP's policy on exceptional circumstances to allow a registrant to not have their name on the register should be clearly published on the register website
3. UKAHPP is to ensure that requirements for lay membership within the Board are explicit within its governance documents, including a minimum number of lay representatives
4. UKAHPP is to review its website to ensure that the information provided to the public is clear and consistent

5. UKAHPP is to ensure that accredited register status is clearly defined and make clear that it applies to UK registrants only, for example through its website. UKAHPP should monitor how its registrants communicate accreditation. Monitoring should take place throughout accreditation life and an update should be provided at annual review
6. UKAHPP is to inform the team if any complaints hearings are scheduled within the period of accreditation so that it may seek consent to observe a hearing.

The Panel provided the following **Learning Points** to be verified at the next annual review of accreditation:

1. UKAHPP should consider how it could use its updated risk matrix as a tool to record, assess and manage risks
2. UKAHPP should consider documenting its policy for handling conflicts of interest
3. UKAHPP should consider documenting a catastrophe recovery or contingency plan and ensure it has succession planning in place for key roles
4. UKAHPP should consider whether it is appropriate for Board members to be able to sit indefinitely on the Board
5. UKAHPP should consider whether a lay representative should be present at Board meetings where decisions are made and document the requirement within its governance documentation
6. UKAHPP should consider continuing to explore options for engaging service users in what it does
7. UKAHPP should consider adding information to its website about the risks and benefits of humanistic psychology
8. UKAHPP should consider developing further guidance to ensure complaints decisions made by its committees/panels are fair and consistent, for example 'indicative sanctions guidelines'.

Annex: Accreditation Panel's Decision – application for accreditation

Organisation:	UK Association for Humanistic Psychology Practitioners (UKAHPP)	Outcome
Panel meeting:	17 and 24 April 2018 26 July 2018	Deferred Accredited with Conditions
Summary of Organisation		
<p>The UK Association for Humanistic Psychology Practitioners (UKAHPP) applied for accreditation of its voluntary register of Humanistic Psychotherapists and Psychotherapeutic Counsellors. UKAHPP was founded in 1980 and became a Private Company Limited by Guarantee in July 2000. UKAHPP states that it protects the public through its primary objective, which is to ensure the consistent and professional standards of practice for Humanistic Psychotherapists and Psychotherapeutic Counsellors by defining membership, registration and accreditation criteria and processes.</p> <p>UKAHPP is run by its members, the profession representatives on the Board are elected from the membership at the AGM. The Board members (Directors) are elected on a rotational basis with one third required to stand down each year, these Directors may stand for re-election and there is no limit on the number of times this can happen. There are currently 12 members on the Board including three lay members, all with equal voting rights at the Board meetings. All the Directors and Officers are volunteers except for the Administrator. The Register is managed by the Registrar who reports to the Board but is not a Director on the Board. Complaints against registrants are managed by the Ethics Committee. The Ethics Committee Chair sits on the Board. This is discussed further under Standard 7.</p>		
Standard 1: the organisation holds a voluntary register for people in health and/or social care occupations.		
<p>UKAHPP applied for accreditation of its register of Humanistic Psychotherapists and Psychotherapeutic Counsellors. The Panel has previously found that the occupations of counselling and psychotherapy satisfy the definition of healthcare, as laid down in the National Health Service Reform and Health Care Professions Act 2002, section 25E (8) - 'Health care' includes: all forms of health care for individuals,</p>		The Panel found this Standard was met.

whether relating to physical or mental health; and procedures that are similar to forms of medical or surgical care but are not provided in connection with a medical condition.'

UKAHPP defines Humanistic approaches as:

'a therapeutic relationship characterised by attitudinal conditions, such as empathy, congruence and acceptance, which when perceived enhance the client's ability to explore, identify, understand and integrate into awareness discrepancies between the known self and actual experience – often the result of distressing behaviour, generated by a psychological conflict between an individual's ability to exercise self-actualisation and a thwarted or frustrated innate actualizing tendency.

Like Psychoanalytic approaches, Humanistic approaches look beyond behaviour and personal constructs to understand the person of the client, their unique experience and the cause of their distress. The client becomes increasingly more open and accepting of the darker sides of their character where conflicts and trauma reside.

Like Behavioural approaches many Humanistic Psychotherapist place a lot of emphasis on action. Like Psychoanalytic approaches they are concerned with exploring the dynamics of the therapeutic relationship and like Behavioural approaches place emphasis on applying learning to new ways of being – though that is a life-long endeavour that continues long after formal therapy has been completed. Unlike Behavioural and Psychoanalytical approaches, there is less emphasis on attaining predetermined curative outcomes – as such Humanistic approaches embrace values not necessarily consistent with prevailing medical (psychiatric) and NICE views about human nature, personality change and wellbeing.

Although Humanistic approaches, like Psychoanalytic and Behavioural approaches have an informed authority about Human Nature, Humanistic approaches value the uniqueness of personal experience and the client's capacity to ascribe their own meaning to experience and to determine their own life choices.'

Registrants on UKAHPP's register are referred to as 'Registered Psychotherapist' or 'Registered Psychotherapeutic Counsellor'. The register can be accessed through the UKAHPP [website](#) from 'UKAHPP Register of Psychotherapists and Psychotherapeutic Counsellors' on the menu. This takes the service user to a landing page which explains the register and provides a link to a pdf version of the

register. The register has the following fields: membership number, name, category of membership, professional description, UKAHPP Accreditation, practice status (which will include details of sanctions) and other registrations. At the site visit, UKAHPP noted that it is working on a new online register which will be searchable by name, but that this had been delayed due to technical difficulties.

At the time of the final Panel meeting, there were 142 registrants on the register. The register is discussed in more detail under Standard 10.

UKAHPP is an organisational member of the UK Council for Psychotherapy (UKCP), and as such, it may sponsor its accredited members for inclusion on the UKCP register. All accredited members must be on the UKAHPP register.

UKAHPP has a Find a Therapist directory which is located on a separate page of the website and so is separated from the register. Only registered members will be able to advertise their services on the find a therapist directory.

UKAHPP noted that it may consider extending its register in the future to include Supervisors and Group Psychotherapists / Group Psychotherapeutic Counsellors and the use of Humanistic Psychology in other professional settings such as teaching organisational consultants. UKAHPP has confirmed that it currently has no plans to extend its register or create a new one and that any changes would be a long-term possibility.

Some UKAHPP registrants may also be registered with statutory bodies or other Accredited Registers. Precedent decisions by previous Panels have stated that organisations should inform the public that some of their registrants may be registered with other statutory bodies or other Accredited Registers and provide links to those organisations to help facilitate routes of complaint for the public. UKAHPP has the following note on the landing page of the register: 'Note that some members choose to be registered through other associations such as the BACP, UKCP or others - see the Professional Standards Authority for a list of registering bodies.' UKAHPP has included a column on its register which notes the dual registrations of the registrant and provides links to the organisations registrants most commonly hold dual registration with on the pdf version of its register.

The Panel noted UKAHPP's long term plans that could potentially mean adding different groups to its register and decided to issue the following Instruction: UKAHPP is to notify the Authority if it plans to add new occupations, modalities, categories to its register.

<p>The UKAHPP Membership and How to Join page of the website states that ‘all practitioners whose practice as a Psychotherapeutic Counsellor or Psychotherapist is endorsed by the UKAHPP will be included in the UKAHPP register.’ UKAHPP confirmed that it did not have an opt-out policy. In exceptional circumstances, for example where there are concerns about a registrant’s safety, the UKAHPP Registrar’s Office will consider requests from the registrant to not be published on the register. These will be considered on a case by case basis by the Board.</p>	<p>The Panel noted that UKAHPP would allow registrants to not appear on the register in exceptional circumstances but that it did not have a documented policy for this. The Panel decided to issue the following Instruction: UKAHPP is to add every registrant who meets its standards on the public register, unless there are exceptional circumstances involving the safety of the registrant. UKAHPP’s policy on exceptional circumstances to allow a registrant to not have their name on the register should be clearly published on the register website.</p>
<p>Standard 2: the organisation demonstrates that it is committed to protecting the public and promoting public confidence in the occupation it registers.</p>	
<p>UKAHPP demonstrates its commitment to public protection through its <i>Code of Practice, Code of Ethical Principles</i>, its complaints procedure, its registration and renewal criteria and its requirement for continuing professional development (CPD).</p> <p>UKAHPP states that it protects the public through its primary objective, which is to ensure the consistent and professional standards of practice for Humanistic Psychotherapists and Psychotherapeutic Counsellors.</p> <p>UKAHPP publishes its Statement of purpose on its website which states:</p>	<p>The Panel found this Standard was met.</p>

'UKAHPP works to advance the diversity of practices and theories of humanistic psychology and so support individuals to grow and realise their unique potential.

It is the professional association for all those who apply the theories of humanistic psychology in their work.

It aims to increase understanding of and access of humanistic psychology in all walks of life and keep people informed through supporting practitioners and wider groups to develop and maintain high standards of ethics and practice.'

The team noted that the statement of purpose and the aims of the organisation published elsewhere are focussed on UKAHPP's professional body role and the support of its members, and do not mention its public protection role. Upon reviewing the summary report, UKAHPP added the following sentence about its public protection role:

'The UKAHPP is committed to enhancing public protection through its function as a UK accrediting organisation of Humanistic practitioners.'

UKAHPP also included a separate webpage called '[UKAHPP and Public Protection](#)' highlighting its commitment to public protection.

The team noted that UKAHPP's Articles are focussed on its professional body role rather than its public protection role. UKAHPP confirmed that it intended to carry out a review of its Articles in 2019. UKAHPP noted that its Articles set out its constitution and its By-Laws outline its rules for governing the organisation.

UKAHPP made changes to its By-Laws which include a statement about its public protection role:

'In accordance with the association's commitment to public protection, all Registered, Accredited and Affiliate members of the UKAHPP agree to: abide by the published Code of Ethical Principles, Code of Practice, Ethical Review Procedure, Complaints Procedure and Disciplinary Procedure; to be in appropriate clinical supervision whilst in practice, to have adequate professional liability

insurance whilst in practice and adhere to the requirements relevant to the category and class of membership they hold.'

UKAHPP stated that its governance structures separate its professional and public interests with the day to day management of registration activities being the responsibility of the Registration, Accreditation and Complaints functions. The Board consists of up to 12 members and includes the Chair of the Accreditation Committee (responsible for accreditation) and the Ethics Committee (responsible for complaints). The Registrar attends the Board meetings to report to the Board but does not have voting rights. The Registrar and the Membership Secretary are responsible for making decisions relating to admission to the register so maintaining a firewall between the Board and the register.

When UKAHPP applied for accreditation, it had a Membership and Accreditation Committee responsible for membership and accreditation. Since then these functions have been split with the Accreditation Committee being responsible for practitioner accreditation matters. Responsibility for membership matters will lie with the Membership Secretary who also sits on the Board. Governance is further discussed under Standard 7.

UKAHPP noted that the appointment of lay members to the Board, an External Moderator and an external Safeguarding Consultant provide further separation. The External Moderator and the Safeguarding Consultant are independent of UKAHPP and the Registrar. These roles are filled by individuals who are not members of the UKAHPP but who have specialist knowledge. The External Moderator's role is to provide UKAHPP with advice on ethical issues and to facilitate the appeal process. The Safeguarding Consultant's role is to advise the General Secretary and the Ethics Committee on all enquiries and complaints that refer to children or vulnerable adults.

UKAHPP has stated that 'to ensure the independence and impartiality of the External Moderator, some decisions may require a Moderating Panel'. The team discussed this regarding complaints during the interviews; UKAHPP stated that all appeal decisions would be made by a panel and that the External Moderator could not act on their own. UKAHPP confirmed that the External Moderator can advise the UKAHPP on 'any matter they think appropriate' and is responsible for deciding if there are grounds for appeal and for any decisions made relating to the appeal.

Section 8 of UKAHPP's By-Laws require all Board members to complete a periodic *Formal Disclosure Statement*. UKAHPP confirmed that all officers, including the registration verifiers, are required to complete this statement. This is discussed more under Standard 5.

UKAHPP's [Code of Ethical Principles](#) describes the ethical principles that registrants are expected to abide by. The [Code of Practice](#) expands on the ethical principles. These include aspects such as respecting the 'dignity, worth and uniqueness of all individuals' and members being 'concerned for the best interests of their clients.' Both documents form an ethical framework that all registrants are required to adhere to. All registrants sign a declaration that they will abide by these codes at initial application and annual review. The *Code of Ethical Principles* and the *Code of Practice* are discussed in more detail under Standard 8.

UKAHPP requires its registrants to self-declare character at application and then at annual review. This is further discussed under Standard 10b.

UKAHPP requires its registrants to keep their practice up to date through CPD. This is further discussed under Standard 10d.

UKAHPP has a complaints procedure in place to provide a redress route and to protect the public. The team noted that UKAHPP has a three-stage process (investigation, adjudication and appeal) with lay representation at the adjudication and appeals stages. Our assessment of their procedure is further discussed under Standard 11.

UKAHPP stated that it will publish sanctions on its register. This was discussed at the site visit where UKAHPP noted that terminations would remain on the register for five years. This is documented within the policy.

UKAHPP confirmed that the sanction will be referenced on the register and that this will act as a link to the published determination which will be published on the [Hearings and Determinations](#) page of its website. The determination will include the findings in full, including registrant name, registration number, complaint reference number, nature and date of complaint, panel decision, mitigations and sanctions details. UKAHPP also confirmed that it will publish a compliance notice or a readmission of registration statement for four weeks once a registrant has demonstrated compliance with the sanction.

Standard 3: risks	
<p>3a) Has a thorough understanding of the risks presented by their occupation(s) to service users and the public – and where appropriate, takes effective action to mitigate them.</p> <p>UKAHPP carried out an assessment of the risks associated with Humanistic Psychotherapy and Psychotherapeutic Counselling and produced the risk matrix supplied to the Panel.</p> <p>The team asked UKAHPP specific questions relating to risks seen with other modalities of talking therapies such as conversion therapy and recovered memories that are false that did not appear in the initial version. UKAHPP noted that conversion therapy is not compatible with the humanistic approach and so would not be considered a risk for this therapy. UKAHPP stated that recovered memories that are false would be a risk and is an issue that one of the UKAHPP Board members has carried out a lot of work on. UKAHPP noted that it is less likely to happen with the humanistic approach, but it is included in the risk register as a potential risk of a registrants' practice, with mitigations such as appropriate training, personal therapy and supervision.</p> <p>Risk Matrix</p> <p>The Accreditation team compared UKAHPP's risk matrix with other matrices produced by the talking therapy Accredited Registers as part of the due diligence checks. The team noted that UKAHPP's risk matrix covered the same risks, such as the potential for boundary violations, working with children and vulnerable people and breaching confidentiality, demonstrating an awareness of the risks associated with the occupation.</p> <p>Mitigations include the Codes of Conduct, CPD requirements, training and education and supervision.</p> <p>3b) Is vigilant in identifying, monitoring, reviewing and acting upon risks associated with the practice of its registrants and actively uses this information in carrying out its voluntary register</p> <p>UKAHPP noted that it identifies and monitors risk through consultative supervision, registrants feeding back good practice from employers, reviewing complaints cases, affiliations with other organisations such as UKCP and feedback from the Ethics Committee, External Moderator, Safeguarding Officer and</p>	<p>The Panel found this Standard was met with a Condition. The Panel reviewed UKAHPP's risk register and noted that it appeared to have the correct risks but that there seemed to be some confusion over identification of the risk owner, and the full mitigations offered by UKAHPP did not appear to have been accounted for. The Panel noted that the new accreditation renewal group will be tasked with updating the risk matrix. The Panel decided to issue a Condition: UKAHPP must update its risk matrix to include more fully all risks, such as remote counselling, and all mitigations, such as training, relevant CPD and adherence to the Codes of Conduct. This should be completed within six months.</p> <p>In line with previous decisions, the Panel issued the following Learning Point: UKAHPP should consider how it could</p>

<p>the public. In addition, UKAHPP will use attendance at conferences, workshops and the scrutiny of publications, such as relevant journals and reports, to identify risks.</p>	<p>use its updated risk matrix as a tool to record, assess and manage risks.</p>
<p>Standard 4: the organisation demonstrates that it has sufficient finance to enable it to fulfil its voluntary register functions effectively including setting standards, education, registration, complaints and removal from the register.</p>	
<p>UKAHPP is a private company limited by guarantee and as such has submitted financial accounts to Companies House for year-end December 2016.</p> <p>UKAHPP's income comes primarily from membership fees which are between £80 and £200 depending on the member's qualification and practice. UKAHPP also charges for accreditation and re-accreditation services.</p> <p>During the site visit the team discussed UKAHPP's insurance policies and professional indemnity cover. UKAHPP noted that it was seeking insurance, which has since been put in place. UKAHPP confirmed that it has Trustee Liability Insurance and that this covers UKAHPP and its officers in case of legal challenge following a disciplinary procedure.</p>	<p>The Panel found this Standard was met.</p>
<p>Standard 5: the organisation demonstrates that it has the capacity to inspire confidence in its ability to manage the register effectively.</p>	
<p>UKAHPP provided brief CVs for its Chair, Registrar and other Board members. The Chair has previous experience of working within the NHS as a Specialist Psychotherapist and a Mental Health Nurse. They have held various roles within the UKAHPP Board and have been the Chair since 2014. The Registrar has experience as a counsellor and psychotherapist as well as previous experience as a lecturer in counselling and psychotherapy. The Registrar has previously held different roles within UKAHPP's governance including as Chair of the Board.</p>	<p>The Panel found this Standard was met.</p>

UKAHPP requires all its Board members to periodically complete and sign a *Disclosure Statement*. The disclosure statement must include details of any complaints and any business, professional or special personal relationships which might cause a conflict of interest with their work. *Disclosure statements* are discussed by the Board who will determine what action should be taken. The By-Laws also state that Board and Committee members are required to disclose any relevant information as it occurs and to 'err on the side of openness'.

UKAHPP requires all Board members to declare a conflict of interest at each Board meeting. UKAHPP reports that Board members always leave the room when decisions are made where a conflict has been declared. Failure to declare a conflict of interest could result in their disqualification as a Director. This is governed by the requirements of UKAHPP's Constitution and so UKAHPP do not have a separate conflicts of interest policy.

The team discussed operational efficiency with UKAHPP during the site visit. UKAHPP noted that data protection is integrated into individual terms of reference and that all sensitive information is kept on secure files. UKAHPP confirmed that it will keep copies of registration, accreditation and complaints for seven years.

At the site visit when discussing the disbanding of the previous Ethics Committee, it was noted that one of the issues found by UKAHPP was inappropriate storage of information by members of the Committee. UKAHPP confirmed that all complaints records are now held by the Administrator. UKAHPP has included data retention requirements within terms of reference and job descriptions for specific roles. UKAHPP notes that this will also form part of the Officers' Annual Disclosure form.

UKAHPP is supported by an Administrator who works part time, all other posts are voluntary. The team asked if UKAHPP had any contingency plans, business continuity plans or catastrophe recovery plans. UKAHPP noted that there is a team of people on the Board who can access documents but that there are no formal contingency plans. The Registrar confirmed that there were two deputies within the Registrar's Office who could do the work if needed.

During the site visit, UKAHPP noted that it had been unable to update its website or the register for three weeks due to technical difficulties. UKAHPP confirmed that the Administrator regained access following this period and UKAHPP now has a new host, so this issue should not reoccur. UKAHPP reported that it

In line with previous decisions, the Panel issued the following Learning Point: UKAHPP should consider documenting its policy for handling conflicts of interest.

At its initial meeting, the Panel issued the following Learning Point: UKAHPP should consider how it could improve its openness and transparency by, for example, publishing Board meeting minutes, minutes of public sessions or excerpts of topics discussed that are relevant to the public interest on its website. It was noted during the Panel meeting on 26 July that UKAHPP had added a page to its website and had published its most recent Board minutes. The Panel therefore decided that this Learning Point was no longer required.

In line with previous decisions, the Panel issued the following Learning Point: UKAHPP should consider documenting a catastrophe recovery or contingency plan and ensure it

<p>can update the register and the website with information relating to disciplinary hearings immediately. The Registrar will be responsible for ensuring the register is up to date and will update this regularly.</p>	<p>has succession planning in place for key roles.</p>
<p>Standard 6: the organisation demonstrates that there is a defined knowledge base underpinning the health and social care occupations covered by its register or, alternatively, how it is actively developing one. The organisation makes the defined knowledge base or its development explicit to the public.</p>	
<p>UKAHPP states that: ‘Humanistic Psychology is the philosophical, modality knowledge base underpinning the practice of psychotherapists and psychotherapeutic counsellors, accredited and registered by UKAHPP. The application of the Humanistic modality is defined by a number of specialist approaches (such as Person-Centred, Gestalt, Transactional Analysis, Psychodrama, Transpersonal etc.) and integrative approaches (the assimilation of a range of different approaches, some from other modalities) characterised by a firm grounding in Humanistic Psychology.’</p> <p>The team noted that the website contains a page about humanistic psychology found within ‘The UKAHPP’ section of its website. This page explains the humanistic approach and provides details and references for some of the work that helped develop the approach. UKAHPP has committed to developing the ‘theory’ side of the website in the future.</p>	<p>The Panel found this Standard was met.</p>
<p>Standard 7: governance</p>	
<p>7a) Ensures that the governance of its voluntary register functions is directed toward protecting the public and promoting public confidence in the occupation it registers.</p> <p>UKAHPP was founded in 1980 and became a Private Company Limited by Guarantee in July 2000. Its Board is made up of volunteers, with the professional members being elected from the membership on a three-yearly basis. At each AGM one third (or three, whichever is the greatest) of the Board stands down but are eligible for re-election. The Board elects a Chair who can hold office for three years. There is no limit on the length of time that a Board member can serve on the Board. UKAHPP noted that current lay members have either been recommended or have a professional affiliation known to UKAHPP. Lay</p>	<p>The Panel found this Standard was met.</p>

members are appointed to the Board with co-opted status and have full voting rights at the Board meetings but not at the AGM. Lay members do not form part of the third that are required to stand down at the AGM.

UKAHPP reported that there are no restrictions on the number of lay people who can be co-opted to the Board but confirmed that the maximum number of Directors was 12. This will be influenced by the experience and skills needed. UKAHPP noted that it makes a distinction between lay members who have specialist skills to offer such as accountancy and those who are members of the public. Currently the lay members on the Board bring with them specialist skills and so are part of the former group, UKAHPP intends to recruit a further lay member to the Board who would be a member of the public.

UKAHPP used Reach Skills and personal recommendation to recruit the current lay members to the Board. All applicants must provide a CV and references and attend an interview. Appointments are made with a six-month probationary period. The Board meets at least five times a year, and all Board members have equal voting rights. There must be a quorum of either one-third or three members, depending on which is the greater number, at a meeting for any decisions made to be valid. There is no time limit on the length of service of a lay member. UKAHPP indicated that it will be reviewing its governance documents, including its By-Laws in 2018 and its Articles in 2019.

UKAHPP states that the Board's main aim is to 'oversee the overall governance and strategic direction of the organisation in the furtherance of its objectives in accordance with the association's constitution and legal & regulatory requirements.' UKAHPP delegates the day to day running to the Administrator and the management of the finances to the Treasurer.

Responsibility for the register is delegated to the Registrar who is a registrant and the Registrar's Office. The Registrar's Office is a sub-committee of the Board made up of volunteers from the UKAHPP membership. The team reviewed the draft terms of reference and noted that these highlight the role of the Registrar's Office in protecting the public. The team noted that the Board 'shall delegate proportionate responsibility and authority to the RO [Registrar's Office] for administering the association's professional register(s).' The Registrar provides a report to the Board and attends Board meetings but does not have voting rights on the Board.

The Panel decided to issue the following Instruction: UKAHPP is to ensure that requirements for lay membership within the Board are explicit within its governance documents, including a minimum number of lay representatives.

The Panel decided to issue the following Learning Points: UKAHPP should consider whether it is appropriate for Board members to be able to sit indefinitely on the Board.

UKAHPP should consider whether a lay representative should be present at Board meetings where decisions are made and document the requirement within its governance documentation.

At the initial Panel meeting, the Panel had serious concerns about the governance arrangements of the UKAHPP. The Panel noted that there did

When UKAHPP applied, the Membership and Accreditation Committee was responsible for assessing applications for membership and for accreditation. The functions of the committee have been split into the Accreditation Committee comprising UKAHPP members, and the Membership function. The Chair of the Accreditation Committee sits on the Board. UKAHPP states that it will be recruiting a Membership Secretary following the AGM in May 2018. The Membership Secretary will be responsible for all membership applications and will be supported by a team of verifiers. The Membership Secretary will sit on the Board. This role is currently being done by the Board.

The Ethics Committee is responsible for the administration and processing of complaints and the *Ethical Review Procedure*. The By-Laws stated that the Ethics Committee is made up of between three and eight volunteers from the membership selected through invitation or by a recruitment notice. The Chair is elected by the Ethics Committee and is co-opted onto the Board with full voting rights. Volunteers must have been full members of UKAHPP for at least two years and not have had a complaint against them upheld. The Ethics Committee meets four times a year. UKAHPP confirmed that the new Ethics Committee has a lay Chair and a further five members, including an additional lay member.

UKAHPP updated its By-Laws in May 2018. The updated By-Laws do not state whether the membership of the sub-committees is professional or lay.

When UKAHPP applied for accreditation, the team noted that the Board of Directors ratified the decisions of the Adjudication Panel and the Appeals Panel. The team asked UKAHPP to clarify the Board's role within its complaints procedures. UKAHPP confirmed that the Board's role was to ratify the decisions. The Board may, if it has sufficient grounds such as where the procedures have not been followed, overturn the decision and provide alternatives. UKAHPP confirmed that this has not happened to date.

The team discussed the ratification of decisions by the Board with UKAHPP. UKAHPP states that 'The word 'ratify' is open to misinterpretation regards the Board accepting Ethics Committee rulings - 'received' would be a better word as the Board does not reject or modify Ethics Committee rulings - the Board receives them on behalf of the organisation which embeds the ruling into the fabric of the organisation and then becomes accountable for. The Ethic Committee as volunteers do hold responsibility and are delegates authority but the Board is accountable for their decisions.'

not appear to be enough separation between the membership functions and the register functions of the organisation, particularly at Board level, and that the Board appeared to be too involved in the day to day business of the organisation. The Panel reiterated that the Board should have an oversight role for the organisation but should not be involved in any way in ratifying the decisions by its committees. The Panel did not agree that this was required to satisfy Companies House requirements and that authority for decisions should be delegated to the relevant committees and panels. The Panel sought evidence of the firewall between its professional body/membership functions and the register.

At its meeting on 26 July, the Panel considered the actions taken by UKAHPP to make the firewall between its professional body and registration functions clear.

Following the initial Panel meeting, UKAHPP updated its policies and procedures to remove the ratification/approval by the Board. UKAHPP clarified that it accepts reports from its committees but that each committee has delegated authority to carry out its duties. This has been clarified within various documents, including the By-laws, Terms of Reference and within policies and procedures.

7b) Carries out its governance in accordance with good practice. It is for the organisation to determine what good practice standards it adopts as appropriate to its form and function.

UKAHPP states that its decision making is informed internally by constitutional requirements and the Codes of Conduct and externally by the Companies Act, Occupational Standards, the Authority's Standards and the Information Commission's Office.

UKAHPP provided examples of how it meets the principles below. Below are some examples:

Being clear about its purpose

UKAHPP's purpose is referenced within its *Memorandum of Association* and on the website in the statement of purpose. The statement of purpose states that 'UKAHPP is a professional membership and accreditation organisation for Psychotherapists and Psychotherapeutic Counsellors and other practitioners who apply Humanistic Psychology in related fields. The UKAHPP is an organisation run by and for its members – providing practical support and ethical codes which all members subscribe to.'

All committees have written terms of reference which clearly state the purpose of each. Each position also has a job description detailing the purpose of the role.

Being independent and fair

The responsibility for making registration decisions rests with the Registrar and the Registrar's Office. The Registrar is independent of the Board. All decisions are made on set criteria which are published on the website. UKAHPP has an appeal process whereby individuals can appeal a decision made by the Registrar.

The Panel were satisfied that this conflict has been resolved.

Complaints are administered and processed by the Ethics Committee. The process for handling complaints is published on the website. UKAHPP has an appeal process whereby both parties can appeal the outcome of disciplinary decision.

Exercising control effectively

UKAHPP reports that it has refused accredited status to 15 applicants since 2012 for not meeting the published criteria. UKAHPP also provides brief details in its application form of cases where membership has been terminated. Six practitioners have been removed since 1992 through its disciplinary procedures.

UKAHPP confirmed that complaints against registrants' practice are heard through the complaints procedure and the only appeal is through a panel convened by the External Moderator.

Behaving with integrity (including proper management of conflicts of interest)

As discussed under Standard 5, UKAHPP requires its Board and Committee members to complete a disclosure statement providing details of any conflicts of interest as well as declare them as and when they arise.

Being open

This is discussed under Standard 5. The team noted that UKAHPP provides its registration criteria, its complaints procedures and information about its purpose on the website.

Being accountable

As a limited company UKAHPP is accountable to Companies House. UKAHPP is also accountable to its membership and reports back through the AGM. Minutes of the AGM are taken and published on the members only part of the website. Approved minutes of Board meetings have been published on the public section of the website from March 2018.

Being socially responsible

The *Code of Ethical Principles* states 'UKAHPP Members do not practice, condone, facilitate or collude with any form of discrimination based on race, colour, gender, sexual orientation, age, religion, national origin, marital status, political belief, mental or physical disability any other preference or personal characteristic, condition or status.'

7c) Demonstrates that it seeks, understands and uses the views and experiences of service users and the public to inform key decisions about its voluntary register functions.

UKAHPP noted it envisages that 'the contribution of lay representation on complaint/investigation panels will provide independent and unbiased views in the organisation's decision-making process.' UKAHPP has also noted that it is committed to increasing the lay membership in other areas of its governance for example by having a 'lay-public' member on its Board.

UKAHPP notes that its website has a facility for members of the public and service users to provide information about their experience of UKAHPP as an organisation or about its members as practitioners.

UKAHPP confirmed that it is looking to establish links with mental health charities and organisations and to develop a wider public engagement strategy.

7d) Ensures that in carrying out its voluntary register functions it is fair, effective, proportionate and transparent so that it is respected and trusted.

UKAHPP provided examples of how it meets this standard, including:

Fair

UKAHPP has appeals policies that allow:

- a) A registrant or a complainant to appeal the outcome of a complaints hearing
- b) A registrant to appeal a registration decision.

In Line with previous decisions, the Panel issued the following Learning Point: UKAHPP should consider continuing to explore options for engaging service users in what it does.

Effective

UKAHPP has removed practitioners from the register through its disciplinary procedures and refused accreditation to members who do not meet its accreditation standards.

Proportionate

UKAHPP has a range of sanctions available to the complaints Panels.

Transparent

UKAHPP publishes all its standards for registration on its website.

7e) Engages with relevant stakeholders and works in partnership with other bodies where appropriate to promote and protect the health, safety and well-being of service users and the public.

UKAHPP noted that its Board and members work with relevant stakeholders. Examples include being part of the Skills for Health Expert Reference Group, being expert readers for relevant National Occupational Standards, and working with UKCP.

7f) Communicates effectively with the public and its registrants. In particular it ensures that the information it provides about its registrants and their occupation(s) helps service users to make informed decisions.

UKAHPP noted that the main point of contact with the public is through the public part of its website. The website also has a member's section which is used to communicate with its registrants. UKAHPP also sends out email newsletters to its registrants.

As part of the assessment of this Standard, the team carried out a Patient / service user journey on the website. The team noted that the website contains an explanation of Humanistic Psychology and the knowledge base. The website does not contain information about what to expect when using a humanistic counsellor or psychotherapist or the risks and the benefits of using a humanistic counsellor or psychotherapist.

The Panel noted the service user journey observations and decided to issue the following Instruction: UKAHPP is to review its website to ensure that the information provided to the public is clear and consistent.

The Panel also issued the following Learning Point:

UKAHPP provides details of its registration criteria on the website as well as an explanation of the different grades. Only the ordinary registered, full accredited and affiliated members are eligible to join the register. These grades are defined on the website. There are several other different membership classes which are sub categories of those on the register. At the site visit UKAHPP indicated that it was looking to rationalise the number of membership classes. The team reviewed the [membership classes](#) and noted that this could be confusing to members of the public.

UKAHPP confirmed that there are four classes of membership:

- Associate
- Ordinary (Registered)
- Full Accredited
- Affiliate

The Associate level is not included on the register. There are four additional descriptors used within the registration categories above which reflect experience and current status in the field:

- Member Emeritus
- Senior Practitioner
- Retired
- Honorary Life Member

At the time of application, UKAHPP had a member list, a register and a find a therapist tool on its website. The team reviewed and noted that this was confusing to the public. UKAHPP has since removed the members list from the website, published a pdf version of its register and confirmed that its 'Find a Therapist' tool will only contain those who are on the register. The team verified this.

UKAHPP provides some information about the education and training requirements for the register. This is discussed further under Standard 9e.

UKAHPP also provides information about complaints against registrants and UKAHPP. This is discussed further under Standard 11.

UKAHPP should consider adding information to its website about the risks and benefits of humanistic psychology.

<p>The team noted that the website was not always easy to navigate and that much of the information is provided from a professional perspective rather than a public perspective.</p> <p>UKAHPP reported that the website is in a transitional phase and that it plans to update its website to become more public focused. This is planned for later in 2018.</p>	
<p>Standard 8: setting standards for registrants</p>	
<p>8a) Sets, requires and promotes good standards of:</p> <ul style="list-style-type: none"> - personal behaviour - technical competence, - business practice (including, as appropriate: financial practice, advertising, customer service, complaints handling, work premises / environment, management and administration). <p>UKAHPP sets standards for its registrants and publishes them in its <i>Code of Ethical Principles</i> and <i>Code of Practice</i>. Registrants are required to comply with UKAHPP's <i>Code of Ethical Principles</i>, <i>Code of Practice</i> and its CPD requirements. Registrants declare this at initial application and at annual renewal</p> <p>The <i>Code of Ethical Principles</i> and <i>Code of Practice</i> set out the personal behaviour and technical competence required for Humanistic Psychotherapists and Psychotherapeutic Counsellors. These codes are published under the Codes of Conduct heading on the website. The <i>Code of Ethical Principles</i> provides the fundamental values expected of a practitioner. The <i>Code of Practice</i> expands on these values, outlining the standards of individual responsibility, confidentiality, consumer welfare, professional relationships and supervision. Examples of personal behaviour that are covered by the codes include requirements for:</p> <ol style="list-style-type: none"> 1) Respecting diversity 2) Respecting the dignity of individuals 3) Respecting confidentiality of clients 4) Working with others 	<p>The Panel found this Standard was met.</p>

The *Code of Ethical Principles* has a section on competence which states that 'UKAHPP members recognise the boundaries and limitations of their techniques and their own personal expertise. They only provide service and use techniques for which they are qualified by training and experience.'

The *Code of Ethical Principles* states that members 'assert that their qualifications conform to the requirements of the UKAHPP.' The education and training requirements to join the registers for an Ordinary Member (Registered) are outlined on the [website](#). UKAHPP requires a minimum of a level 5 on the QAA Framework to be on the register. This is discussed further under Standard 9.

Registrants are expected to keep their knowledge up to date as noted in the *Code of Ethical Principles*, which states that 'UKAHPP members recognise that they work in a developing and highly active field in which valuable new ideas are constantly emerging. They make specific arrangements for continually monitoring their own knowledge and capabilities and have an ongoing commitment to continue to develop their personal competence.'

UKAHPP reports that its members are required to ensure that their physical work environment is appropriate, that they are covered by indemnity insurance and that all therapy contracts are explicit about the type of therapy, frequency and duration, fees and payment, arrangements for cancellations and limits to confidentiality. These are referred to in paragraph 4.11 of the *Code of Practice* which states that 'Contracts with clients are explicit as regards fees, payment schedule, holidays and cancellation of sessions by the client or UKAHPP Member and session frequency. The likely length of therapy, the methods to be utilised, transfers of clients and terminations are discussed openly and specifically with clients at the onset of the professional relationship.'

8b) Bases its standards of competence upon its defined body of knowledge.

UKAHPP requires all its registrants to have completed a qualification, associated with an acceptable examinations board, such as Ofqual, in Humanistic Psychotherapy or Psychotherapeutic Counselling to ensure that its registrants' training reflects the humanistic approach.

8c) Requires its registrants, where relevant to their occupation, to use products and equipment that are approved as suitable and safe for use in health and social care. It provides clear guidance to registrants on any special requirements relating to the suitability of premises,

products and equipment for the practice of their occupation, which are essential to protect the health, safety and well-being of service users.

UKAHPP states that this Standard is largely not applicable as 'humanistic approaches are primarily talking therapies that do not involve any products or equipment.' UKAHPP confirmed that it does not produce any additional guidance on other aspects of therapy such as location or lone working. UKAHPP notes that these aspects would normally be covered through training.

The team noted that paragraph 4.8 of the *Code of Practice* refers to the work environment and states that 'The UKAHPP Member's physical work environment is appropriate to the services offered and conducive to the safety and privacy of the clients and therapist.'

When reviewing the register, the team noted that some registrants are offering therapy via skype and email. UKAHPP confirmed that it does not issue any guidance for providing therapy via these, but it will look at issuing guidance in the future.

8d) Requires registrants to have appropriate arrangements for indemnity cover.

UKAHPP requires its registrants to have appropriate indemnity cover as noted in paragraph 4.9 of the *Code of Practice* which states that 'UKAHPP Members ensure that their professional work is adequately covered by appropriate indemnity insurance'. UKAHPP requires its registrants to provide evidence at initial application, this is double checked by the Registrar before admittance to the register. Registrants are also required to self-declare as part of the annual declaration that they have appropriate indemnity insurance; the Registrar carries out a 10% audit of those renewing.

8e) Encourages good communication and requires registrants to provide clear information to service users to help them to make informed decisions and to make readily available information about complaints processes.

This is a requirement under section 4.3 of the *Code of Practice* which states that 'UKAHPP Members fully inform consumers as to the purpose and nature of different approaches and procedures.' UKAHPP confirmed that its registrants should provide information about complaints within their therapy literature and discuss any queries that clients may have.

In line with previous decisions, the Panel issued the following instruction: UKAHPP is to ensure that accredited register

8f) Publishes its standards for registrants.

UKAHPP publishes its standards for registrants on its website. The registration criteria can be accessed from the [Registration](#) tab, which includes details of the education and training requirements. Other relevant standards include the *Code of Ethical Principles* and *Code of Practice*, which are also available from the website.

8g) Encourages, where relevant, effective team work.

UKAHPP registrants generally work in independent practice. UKAHPP's *Code of Practice* has a specific section on professional relationships which states that 'UKAHPP Members act with due regard for the needs, special competencies and obligations of their colleagues in all professions' and 'UKAHPP Members are aware of the extent of their capabilities and understand the areas of competence of related professions. They make full use of this knowledge to serve the best interests of the consumer.'

Effective teamwork is also covered in the sections on trainers and supervisors within the *Code of Practice*.

8h) Keeps under review and evaluates its standards, considering whether they are achieving the outcomes it intends for service users and the public.

UKAHPP confirmed that all its standards, guidelines, policies and procedures have a built-in review requirement. Procedures and policies are updated by the parties that are responsible for them, for example the complaints procedure would be updated by the Ethics Committee and the registration criteria by the Registrar. All amendments are discussed and agreed by the Board before being finalised.

status is clearly defined and make clear that it applies to UK registrants only, for example through its website. UKAHPP should monitor how its registrants communicate accreditation. Monitoring should take place throughout accreditation life and an update should be provided at annual review.

Standard 9: education and training

9a) Sets appropriate educational standards that enable its registrants to practise competently the occupation(s) covered by its register.

UKAHPP requires its registrants to have completed a minimum of a Level 5 course (on the QAA framework) in a recognised humanistic approach. The course must include:

- 400 hours of tutor contact
- A placement with at least 100 client contact hours
- Supervision equating to one hour for every six client hours
- 30 hours of personal therapy.

UKAHPP states that the courses must be from a recognised UK Higher Education or Further Education institution. These courses usually hold BACP or UKCP accreditation and adhere to the National Occupational Standards for Humanistic Psychotherapeutic Counsellors and Psychotherapists. UKAHPP will consider practitioners who have trained in other countries providing they can demonstrate equivalence to the above requirements.

9b) Ensures that registrants who assess the health needs of service users and provide any form of care and treatment are equipped to: Recognise and interpret clinical signs of impairment, recognise where a presenting problem may mask underlying pathologies and have sufficient knowledge of human disease and social determinants of health to identify where service users may require referral to another health or social care professional.

UKAHPP's *Code of Ethical Principles* states that 'UKAHPP Members recognise the boundaries and limitations of their techniques and their own personal expertise. They only provide service and use techniques for which they are qualified by training and experience. They take whatever precautions are necessary to protect the welfare of their clients and refer them on to other professionals whenever appropriate.'

UKAHPP confirmed that this is emphasised during training and will be monitored through supervision.

The Panel found this Standard was met.

9c) Requires its registrants to meet its educational standards and assures itself that they do.

UKAHPP's standards for entry to the register are published on its website. UKAHPP requires all applicants to provide copies of their certificates as part of their application. These certificates are checked to ensure they meet all the stated criteria. UKAHPP keeps a list of 'approved' courses, which have previously been checked by UKAHPP and have met the set criteria. If the course is not on this list, the applicant may be asked to provide further evidence that they meet the standards.

The Registrar carried out the education and training checks for the initial cohort of registrants. This function has since been moved to the Membership Secretary role which is currently being carried out by the Board.

UKAHPP noted that it has existing members who hold the European Certificate of Psychotherapy. UKAHPP confirmed that these members have undergone the full accreditation process and that it has no provision to automatically accept this qualification for registration purposes.

9d) Only approves or accepts those education and training courses that equip students to meet its educational standards.

UKAHPP notes that it accepts applicants who have completed a training course in Humanistic Psychotherapy or Psychotherapeutic Counselling that has been accredited by UKCP or BACP and has met the other requirements of registration.

UKAHPP confirmed that 'The UKAHPP Accreditation and Membership functions and the Board monitor on an ongoing basis the registration and accreditation criteria of the UKCP, BACP and other organisation's.'

9e) Makes its education and training standards explicit and easily accessible to the public to enable all those using the register to make informed decisions.

Information about the education and training requirements for registration can be found from the [UKAHPP Membership and How to Join](#) page. This page provides details of the different membership

<p>levels and links to further information specific to each level. There are three categories of membership on the register:</p> <ol style="list-style-type: none"> 1) Ordinary Registered Membership 2) Full Accredited Registered Membership 3) Affiliate Membership. <p>The Ordinary Registered Membership is the register entry level. To be registered, practitioners must have completed a minimum of a diploma level (level 5 on the QAA framework) in psychotherapeutic counselling or psychotherapy, as noted on the website, or equivalent. As discussed under Standard 9a, the website provides details of the elements the courses are required to have. Full Accredited Registered membership and Affiliate membership require the successful completion of a level 7 course. The team noted that this is not clear on the website.</p>	<p>The Panel noted that it had issued an Instruction (Instruction 4) for UKAHPP to ensure the information on its website is clear and consistent. This should include information about the education and training requirements for Accredited Registered membership and Affiliates.</p>
<p>Standard 10: the register</p>	
<p>10a) Focuses on promoting the health, safety and well-being of service users and the public and generating confidence in its register.</p> <p>UKAHPP defines the function of the register as being a resource that can be used by the public to check the status of their therapist. UKAHPP states that it protects the public by producing standards, ensuring its registrants adhere to its Codes and have adequate indemnity cover, and carrying out regular CPD checks. UKAHPP has procedures for ensuring that applicants meet and continue to meet its registration standards as discussed under Standard 10c. Where issues are identified, processes are in place to remove or sanction registrants as discussed under Standard 11.</p>	<p>The Panel found this Standard was met with a Condition.</p>

10b) Maintains a register that is accurate, easily accessible to the public and supports all those using it to make informed decisions.

The register is currently found on the website as a pdf linked from the homepage and titled the [UKAHPP Register of Psychotherapists and Psychotherapeutic Counsellors](#). This is a new register, which was previously held directly on the website. The register includes five categories of membership:

- a) Affiliate
- b) Ordinary Registered Member
- c) Full Member
- d) Full Member Emeritus
- e) Honorary Life Member

The five categories of membership on the register were different to the three notified to the team by UKAHPP. There was some disjoint between the information provided to the team, the register and the [UKAHPP Membership and How to Join](#) webpage in terms of registrant categories.

On review of the summary report, UKAHPP updated its [register](#) to make it clearer which of the three categories as discussed under Standard 7 the registrant belongs too. The subcategory is now presented in brackets.

The team reviewed the published register on the website and noted some inaccuracies and inconsistencies in the information displayed. These were reported to UKAHPP, who remedied them immediately.

When carrying out initial register checks, the team noted that one of the registrants lived in Singapore. UKAHPP confirmed that it had four overseas members who were all retired and not included on the register. UKAHPP stated that all will be informed that registration with UKAHPP is only applicable to practice within the UK.

Following its review of the summary report, UKAHPP confirmed that it does not invite applications from people who are resident and working abroad. UKAHPP do have some members who trained in the UK and have since moved abroad. UKAHPP confirmed that as long as the registrant continues to meet the standards for registration and re-accreditation, then the registrant can remain registered. UKAHPP will

The Panel noted that the team had found inaccuracies and inconsistencies on the UKAHPP public facing register and decided to issue UKAHPP with the following Condition: UKAHPP must develop quality assurance processes to ensure the information on the public register is accurate. This should be completed within six months.

produce a policy for overseas registrants which will include the provision for the registrant to have appropriate indemnity cover for the country in which they work and that complaints will be heard in the UK. The UKAHPP policy will make it clear that overseas registrants cannot make use of the quality mark.

10c) Only allows those who meet its standards to join and remain on/be on the register.

There are two routes of entry to the register:

- a) Through the completion of a suitable academic qualification
- b) Through an alternative route (this route has been suspended until 2019)

For both routes, applicants are required to complete the application form which can be accessed online. Applicants are required to be members to join the register; applications for membership and registration can be processed simultaneously.

Those applying through the academic route need to demonstrate that their course meets the criteria set out in Standard 9a as well as providing copies of the certificates. Those applying through the alternative route will need to provide details of any relevant training (with copies of certificates), complete a personal statement detailing how their practice fits with the humanistic approach and provide details of their continuing professional development (CPD).

Applicants for both routes are required to declare that they:

- a) hold adequate indemnity cover
- b) commit to a minimum of 20 hours a year and 250 hours over a five-year period of CPD
- c) have supervision
- d) have made arrangements for a therapeutic executor
- e) have not been or are not currently the subject of any complaints
- f) have no criminal convictions.

In addition, all applicants are required to sign a statement that they agree to abide by the *Code of Ethical Principles*, the *Code of Practice* and the *Complaints Procedure*.

Following its review of the summary report, UKAHPP reported that the alternative route has been suspended until further notice due to the increased workload this requires. This route is unlikely to open before 2019.

For the academic route, applications are sent into the Administrator who checks to ensure that the application is complete and has been submitted according to process. Applications are then sent to the Membership Secretary's Office who check that all parts of the form are complete and signed, that evidence of indemnity insurance and the supervisor's statement have been submitted and that all additional documentation has been included. The Membership Secretary's Office will carry out checks to ensure that the applicant meets the published criteria. Applications that meet the published criteria are then sent to the Registrar's Office for further checking before a decision is made about eligibility to join the register. Successful applicants are informed by the Registrar and the register is updated. UKAHPP confirmed that the register can be updated daily as necessary. Unsuccessful applicants are unable to join UKAHPP as an Ordinary Member. The Registrar also provides a report to the Board of all new entries to the register.

Unsuccessful applicants are informed by the Registrar with information about the criteria that have not been met and with suggestions of how they could be met. Applicants who decide to re-apply must start the application process from the beginning. Unsuccessful applicants can appeal the decision as described under Standard 10f.

The team noted that the procedure for processing applications to the UKAHPP register stated that 'the Registrar's Office is charged with advising the Board of Directors if it is of the opinion that an application should not be progressed.' The team asked if the UKAHPP Board could overturn the decision of the Registrar's Office on unsuccessful applications. UKAHPP confirmed that 'unless there are serious concerns about the functioning of the Registrar's Office or the ability of an officer to make rational decisions due to physical or mental health, the Registrar's decision will be final – the Board's responsibility is to affirm the Registrar's Office decision, not to review it.'

Registrants are required to complete a notification of practice and annual declaration renewal form confirming that they remain fit to practice. This form asks for confirmation of indemnity, CPD, supervision, the existence of a Therapeutic Executor, whether there have been any breaks in practice of longer than three months over the past year, and if they are the subject of any complaints or criminal

convictions. Registrants are asked to sign to confirm that their health and character will allow them to practice safely.

The Registrar's Office will check a random sample of annual declarations as discussed under Standard 10d.

Previously, UKAHPP's register was only open to those members who had achieved accreditation with UKAHPP. To achieve accreditation, members must complete a postgraduate course in humanistic psychotherapy or psychotherapeutic counselling and have varied experience, personal therapy and supervision. Accreditation revalidation is required every five years. As part of the application process to the Accredited Registers programme, UKAHPP created a new register, which has a lower entry requirement in terms of education and training, with Ordinary Member (Registered) being the entry level grade. Therefore, UKAHPP moved its accredited members to the new register as these members already met all the requirements to be registered. UKAHPP has now opened its register to non-accredited members. UKAHPP stated that it will continue to offer accreditation to its members and that there will be no change in the accreditation process except to make registration with the UKAHPP a pre-requisite for applying for accreditation.

10d) Requires registrants to keep their practice up to date and checks at appropriate intervals that registrants continue to meet its standards. In deciding its arrangements the organisation takes account of: The pace and extent to which professional practice is subject to change (for example, technological advancements or research based findings); The nature and extent of risk registrants' practice poses to service users and the public.

A commitment to CPD forms part of the *Code of Ethical Principles* which states that 'Members recognise that they work in a developing and highly active field in which valuable new ideas are constantly emerging. They make specific arrangements for continually monitoring their own knowledge and capabilities and have an ongoing commitment to continue to develop their personal competence.'

Applicants are expected to declare their commitment to CPD in the initial application form and registrants are expected to re-confirm this commitment as part of an annual declaration. Registrants are expected to complete a minimum of 20 hours CPD a year covering different types of CPD with at least 250 hours in a five-year period as recorded within UKAHPP's CPD policy. The Registrar's Office will carry out annual

checks on 10% of registrants to check compliance. These checks will start in September 2018 and will include a check on indemnity, supervision and photo ID. Those who do not comply within a given period will be suspended from the register following a reminder. This will be noted on the register as 'Suspended - Annual Renewal Default'.

UKAHPP has confirmed that the 'significant learning outcomes' of the audit will be communicated to the membership.

10e) Recognises decisions regarding professional conduct made by regulatory bodies and other registers accredited by the Professional Standards Authority when deciding whether a person should be admitted, kept on or removed from their register.

The team asked UKAHPP to confirm whether it will recognise decisions regarding professional conduct made by regulatory bodies and Accredited Registers when deciding whether a person should be admitted, kept on or removed from the register. UKAHPP stated that it 'will respect decision made by regulatory bodies (Statutory and PSA Accredited) regarding the conduct of existing and potential registrants and for this to be reflected in UKAHPP's decision making via the Registrar's Office and conveyed in the publicly available UKAHPP Register – including removals from the register.'

10f) Explains clearly the circumstances in which it will review its decisions relating to admissions to the register and removal from it, and explains how it will do that.

UKAHPP had an appeals policy whereby an applicant can appeal the registration decision of the Registrar's Office. Appeals would be made in writing outlining the reason for the appeal and sent to the Registrar. The Registrar and two Deputy Registrars would hear the appeal. The Registrar may uphold the original decision, uphold the appeal or request further information. The Registrar's decision would be final – there can be no further appeal if rejected. A new application could be submitted for consideration 12 months from the date of the first submission.

Following the initial Panel meeting, UKAHPP revised its [Procedure for processing Ordinary Member applications](#). Applications are received by the Administrator who checks them to ensure that they are complete. Applications are then sent to the Membership Committee and allocated to members of the Committee. The application is checked by the verifiers who ensure that the application meets the

One of the concerns raised by the Panel in its initial meeting related to the appeals process, which appeared to allow the Registrar to hear appeals against their own decisions. The Panel were satisfied that the revised procedure removed the conflict of interest.

<p>published criteria (verifiers are UKAHPP registrants with specialist knowledge who can be co-opted onto the Committee). The verifiers can request further information if needed. Unsuccessful applicants with minor omissions are provided feedback and given eight weeks to fill the gaps. Unsuccessful applicants with larger omissions are provided with feedback and given 12 months to re-submit. Successful Applications are then sent to the Registrar for quality assurance checks.</p> <p>Unsuccessful applicants can apply to the Membership Secretary for a review of the decision. The Membership Committee will convene to review the decision. The Committee member who made the decision to not approve the application will explain how they reached the decision but will then remove themselves from the meeting and will have no further involvement in the decision.</p> <p>At the time of the initial Panel meeting, UKAHPP did not have a restoration policy; anyone wishing to be re-admitted to the register following disciplinary proceedings or who has lapsed would need to submit a new application. UKAHPP has updated its procedure for processing Ordinary Member applications, which now states that individuals can re-apply to the register following a complaints outcome in no less than three years. It provides information about what they need to do and who will make the decision.</p> <p>UKAHPP has an appeals policy whereby an Appeals Panel will hear appeals against sanctions made during the complaints procedure. The procedure is further discussed under Standard 11e.</p>	<p>At the initial Panel meeting, the Panel decided to issue the following Instruction: UKAHPP is to document its policies regarding restoration or readmission to the register. At its meeting on 26 July, the Panel reviewed UKAHPP's updated policy and decided that this Instruction was no longer required.</p>
<p>Standard 11: complaints and concerns</p>	
<p>11a) Provides clear information about its arrangements for handling complaints and concerns about its registrants.</p> <p>UKAHPP's website has a page about Raising Concerns and Making a Complaint in the 'Codes of Conduct' menu. This page explains how to make a complaint against a UKAHPP registrant, against a</p>	<p>The Panel found this Standard was met with a Condition.</p> <p>At the initial Panel meeting, the Panel had concerns that related to Standard 11.</p>

UKAHPP registrant who is also a UKCP registrant and against UKAHPP. There is a further page with provides details of the [Complaints Procedure](#).

Throughout the application process, UKAHPP revised its procedures for handling complaints. This included significant redrafting of these following the Panel's deferment ahead of the Panel meeting on 26 July 2018. UKAHPP distinguishes between practice complaints which are handled through the *Complaints Procedure* noted on the [website](#) and complaints against the organisation, handled through the Organisational Complaints Procedure. In addition to these processes, UKAHPP has a Disciplinary Procedure, which 'is a procedure for managing the performance of its appointed Officers and the conduct of Members in relation to non-practice incidents. It also covers the conduct of Members who are Not Registrants and are NOT included on the Register.' Through this process, membership can be terminated through Article 4 of the Articles of Association:

'The directors shall have right for good and sufficient reason to terminate the membership of any member PROVIDED ALWAYS that the member concerned shall have a right to be heard before a final decision is made.'

UKAHPP added that 'Article 4 is not an alternative complaints process, it is a vehicle for the Board to manage the internal affairs of the organisation regarding disciplinary matters and non-practice concerns about the conduct of members and the performance of those holding office. It also applies to the conduct of members not covered by the Complaints Procedure such as Associate Members.'

UKAHPP's website states that complaints against registrants that are also UKCP registrants will be handled through UKCP's *Central Complaints Procedure (CCP)* and directs members of the public to contact UKCP directly. The complaints procedure also states that UKAHPP will pass on such complaints to UKCP. The page contains the UKCP contact details. UKAHPP confirmed that it will remain an organisational member of UKCP and that it will observe any sanctions found against a member with dual registration.

For those who are not registered with UKCP, complaints should be made directly to the UKAHPP by writing to the General Secretary (see Standard 11c). The webpage provides a postal address and the admin email address.

The Panel did not think it was clear which complaints process would be used under what circumstances and noted that it is not appropriate for the same people to be responsible for the investigation, adjudication and appeal as appeared to be the case in the Disciplinary Process. The Panel also raised concerns about the Article 4 process, allowing the Board to remove registration from an individual without going through the complaints process.

The Panel raised concerns about the role of the General Meeting. It considered that it was inappropriate for decisions from the complaints system to require any ratification by the General Meeting. Those decisions should be made independently.

The Panel was additionally concerned that the criteria for accepting complaints either from third parties or where the complaint is outside the

Through the formal Complaints Procedure, an Interim Suspension Order can be issued during the initial investigation as a precautionary measure. This will be recorded on the register and published on the public aspect of the website with an explanatory note.

The Complaints Procedure contains details about the information that should be included in the statement of complaint. Complaints must be signed, contain the name of the complainant and the registrant, state the relationship and include details of the incidents being complained about. Complaints will normally be accepted within three years of the occurrence or three years from the date the complainant became aware of the occurrence.

The registrant must have been a member of UKAHPP at the time the incident(s) took place and once a complaint has been received will not be allowed to resign until the complaints process has been completed. Complaints can be made by those using or seeking the services of the registrant, by a parent, guardian or responsible adult acting on behalf of a child or vulnerable adult or another third party acting on behalf of a member of the public using or seeking the services of a registrant. Acceptance of third party complaints, and those outside of the prescribed timeframes, will be decided upon by the Ethics Committee.

UKAHPP reserves the right to take a complaint forward which raises concerns about a registrant's fitness to practice and where there is no complainant, the complainant has withdrawn their complaint, or the complainant wishes to remain anonymous. In these cases, the General Secretary will invoke investigation proceedings and the Board will be identified as the complainant.

UKAHPP states that if a complaint has been lodged against a member who is registered with more than one professional organisation, UKAHPP will liaise to decide who is best placed to hear the complaint and will observe the ruling of the other body. UKAHPP states that it will conduct all complaints where the second organisation is not an Accredited Register.

If the Ethics Committee decides there is a *Prima Facie* case to answer, then they will write to the complainant and the member complained against within seven days via the General Secretary informing them of next steps. The Ethics Committee appoints a Complaint Coordinator to oversee the stages of the complaint. The Complaint Coordinator is selected by the Ethics Committee from its membership.

timeframe appeared to include matters which were not obviously relevant and did not prioritise public protection.

At its meeting on 26 July the Panel considered the actions taken by UKAHPP in response to the concerns raised and noted the amount of work UKAHPP had undertaken to improve its processes and procedures.

The Panel noted the revised Article 4 and the changes to the By-Laws to reflect this. The Panel noted that paragraph 3.6 of the By-Laws only reflected the Disciplinary Procedure and suggests that UKAHPP may wish to reference its Complaints Procedure as well.

The Panel noted the work that UKAHPP had done to update its policies and procedures. The Panel noted that while these were much clearer, there was still scope for confusion. The panel considered the risk and noted that UKAHPP has historically received very few

The Complaint Coordinator may allocate a facilitator to each party who offer help and support throughout the process (see Standard 11c). The parties to a complaint may appoint their own facilitator. If the case is suitable and both parties agree, the Complaint Coordinator will arrange mediation (see Standard 11b). Agreeing to mediation does not deny either party access to a formal investigation.

In cases where mediation is not suitable or where mediation has been unsuccessful, the case is progressed to the next step, which is investigation. Through this process, the Ethics Committee assesses the evidence to determine whether there is a case to answer.

Where there is a case to answer, an Adjudication Panel will be convened, formed of a minimum of four members, including a lay member. Panel members will have had no previous involvement with either party. The Adjudication Panel hearings will be held in private. The Adjudication Panel will determine if there is a breach of the Codes, and if so whether a sanction should be imposed. The outcomes available to the Panel are:

- No Sanctions
- Written Warning
- Final Written Warning
- Improvement Order
- Conditions of Practice Order
- Suspension Order
- Dismissal Order.

Both the Complainant and the member complained about can appeal the decision (see Standard 11d).

Concerns against itself

Details on how to raise concerns and complaints against UKAHPP are included on the Raising Concerns and Making a Complaint page of the website, which can be found within the Codes of Conduct menu. This page notes that the concerns should be raised with the individuals involved in the first instance, or if this is not possible, in writing to the Board. UKAHPP confirmed that it would accommodate those who were unable to put complaints in writing by for example appointing a facilitator. UKAHPP will

complaints and is a relatively small register. The panel decided to issue a Condition: UKAHPP must review the wording and the practicalities of the Complaints Procedure and the Disciplinary Procedure to ensure that it is clear which process will be used and when. This is to be completed and sent to the Accreditation team within six months of the date of accreditation.

The Panel issued the following Instruction: UKAHPP is to inform the team if any complaints hearings are scheduled within the period of accreditation so that it may seek consent to observe a hearing.

acknowledge the complaint within 28 working days and send a copy of the organisational complaints procedure to the complainant. The [Organisational Complaints Procedure](#) is published on the website.

There are three stages to the organisational complaints procedure: investigation, adjudication and appeal. The investigation stage includes a fact-finding investigation and includes the offer of alternative dispute resolution and proposal of an action plan/remedy to resolve the issue. UKAHPP may at this stage admit culpability and apologise. If the complainant is not satisfied with this outcome, the complaint will progress to the adjudication stage. An Adjudication Panel, formed of a minimum of four members who have had no prior involvement with the complaint or complainant, including a lay member, will hear the complaint. The Adjudication Panel will communicate the outcome of the hearing to the complainant, who has the right to appeal the decision.

11b) Encourages early resolution of complaints including use of mediation where appropriate and it has adequate monitoring arrangements in place to identify matters that require disciplinary action.

At the initial Panel meeting, UKAHPP had an [Ethical Review Procedure](#) which allowed members and clients to clarify whether a proposed course of action or mode of conduct would be within the Codes. The procedure provided some examples of where it might be used. The procedure could only be used before a proposed action has occurred or immediately when it is realised that an action may be unethical. A member could use this procedure to raise issues with their own practice or another UKAHPP member's practice. The procedure would be administered by the Ethics Committee. One of the outcomes of an ethical review is the escalation of the issues to the Complaints Procedure.

The Ethical Review Procedure had not been updated since November 2002.

Following the initial Panel meeting, UKAHPP confirmed that this procedure has been suspended pending a review. If UKAHPP decides to reinstate the Ethical Review procedure, it will not fall within the remit of the Ethics Committee.

Separate to the Ethical Review Procedure, UKAHPP has a documented mediation process within its Complaints Procedure; if the case is suitable and both parties agree, mediation will be offered. The mediator may be a member of UKAHPP or a lay person with no connection to the member complained

The Panel noted the Ethical Review Procedure and felt that this was a membership body function rather than a register function and as such should not be under the remit of the Ethics Committee. the Ethical Review Procedure was subsequently disabled until further notice by UKAHPP.

against. The mediation meeting will take place within 28 days of the appointment of the mediator. If the case is not suitable for mediation, no agreement can be made, or the registrant fails to comply with any agreed actions, then the case will progress through the Complaints Procedure.

The team noted that the Complaints Procedure stated that 'The two parties involved will pay the mediators fee, UKAHPP will pay venue fees. All payments must be made in advance.' The team also noted that the Procedure states that 'Costs borne by UKAHPP may be required from either party to the complaint.'

The team discussed this with UKAHPP. In its subsequent updated Procedure, UKAHPP removed the possibility of requiring costs from either party, and states that UKAHPP will pay for one mediation meeting. The procedure now reads 'UKAHPP is not responsible for travel or any other expenses incurred by the Complainant, or the member complained against or by any witnesses, at any stage of the complaint.'

11c) Provides good advice and support for those providing information and evidence in relation to complaints and disciplinary cases.

UKAHPP notes that if the complainant makes it known that they have difficulties in making a written complaint, UKAHPP will arrange for the complaint to be taken in another format, for example by transcribing a phone call or offering a third-party facilitator. UKAHPP provided an example where a third-party facilitator had been used. The team noted this was not clear on the website or in the complaints procedure.

The Complaint Coordinator allocates facilitators to the parties involved in a case. The facilitators are independent of both the complainant and the member complained against. Their role is to offer help and support throughout the process. This can include helping the complainant to formulate the complaint in terms of the UKAHPP Codes, exploring the possibility of mediation, and supporting the complainant through a hearing. Both parties can refuse the help of a facilitator or provide their own.

UKAHPP's procedure allows for the parties involved and any witnesses to attend the hearing at different times in specific circumstances to avoid direct communication. The complainant can also choose for

At the initial Panel meeting, the Panel issued the following Learning Point: UKAHPP to consider making the support that it will offer to those providing information and evidence in complaints against registrants and itself explicit on its website (vulnerable and otherwise). Following its review of the updated processes, the Panel decided that this was no longer required.

their supporters to act as their representative and all questions during cross examination go through the Chair of the Adjudication Panel.

11d) Focuses on protecting service users and the public where necessary and putting matters right where possible.

UKAHPP informed the team during interviews that where a case was of a criminal nature that it would suspend the member until the conclusion of the criminal case was reported. The team noted that paragraph 2.3 of the complaints procedure states that the General Secretary in consultation with the Chair of the Ethics Committee can issue an Interim Suspension Order. Interim suspension would be considered in cases where:

- Allegations give rise to a serious risk to public safety
- Allegations have been made about serious physical, emotional or sexual abuse that may be re-committed
- There is evidence that a criminal offence has been or is likely to be committed
- The complaint was upheld there is high probability it would result in the issuing of a Dismissal Order and termination of registration.

Such interim orders would be published on the register. UKAHPP does not have a time limit on interim suspensions, which may remain in place until the outcome of an appeal, but states that 'it will attempt to minimise the time interim suspensions are in place'

11e) Makes sound decisions that are fair, transparent, consistent and explained clearly.

The Complaints Procedures notes the following sanctions that are available:

- Written Warning
- Final Written Warning
- Improvement Order
- Conditions of Practice Order
- Suspension Order
- Dismissal Order.

The Panel noted that in the absence of its own document, the UKAHPP Ethics Committee uses UKCP and HCPC Indicative Sanctions Guidelines. The Panel decided to issue the following Learning Point: UKAHPP should

UKAHPP confirmed that those removed from the register due to practice complaints are also removed from membership. UKAHPP noted that under the new procedure covering Article 4 of the Articles of Association ‘Termination’ enforced as a result of a non-practice based matter – may not necessarily be recorded on the publicly available register – to be determined on an individual basis by the Board with consultation with the Registrar and in line with any legal advice.’

The team asked if UKAHPP had any guidance for the issuing of sanctions. UKAHPP noted that it did not have specific guidelines but that its Ethics Committee holds guidance used by other organisations which can be used as a tool to inform decisions.

The procedure states that sanctions are published on the register until the sanctions have been spent and any timeframes specified in the sanctions have expired. For removals from the register this will remain published for a minimum of five years.

All sanctions will be noted on the public register as a hyperlink to a sanctions page where details of the complaint and the panel determinations will be noted. A ‘Sanctions Compliance Notice’ will appear for four weeks on a separate page when sanctions have been met. UKAHPP noted that sanctions may remain in force and appear on the public register if the registrant fails to complete sanctions within the specified time frame.

UKAHPP has an appeals policy, written into the complaints procedure. Either the complainant or the member complained against can appeal a decision on the grounds that the procedure was not followed, or that the sanctions are unfair or disproportionate, by writing to the General Secretary within 28 days of receiving the notice of the Adjudication Panel’s findings.

The appeal is forwarded to an External Moderator whose role it is to make a ruling on whether to uphold the Appeal. The External Moderator is independent of UKAHPP. The Ethics Committee appoints an Appeal Panel made up of a minimum of two people, including one lay, in addition to the External Moderator. The External Moderator will determine whether the appeal will be conducted through a review or a hearing.

The Appeal Panel can decide to uphold the original decision, modify the decision or uphold the appeal.

consider developing further guidance to ensure complaints decisions made by its committees/panels are fair and consistent (for example ‘indicative sanctions guidelines’)

<p>11f) Reports concerns to other relevant agencies when that is needed to protect the public.</p> <p>UKAHPP confirmed that it will inform the police and / or other relevant safeguarding authorities in cases where there is evidence of criminality or a safeguarding issue.</p>	
<p>Share your experience and concerns about the Accredited Register received in the previous year of accreditation</p>	
<p>The Accreditation team received three responses to the invitation to share experience, only one of which provided permission for us to share with UKAHPP. As the one individual providing permission to share their response would have identified others in that response, the team did not to share the full response with UKAHPP. All the concerns raised related to a specific set of incidents which occurred between 2013 and 2016. The team reviewed the case file as part of its proxy assessment of complaints at the site visit.</p>	<p>The Panel considered the Share your experience responses in making its decision about accreditation.</p>
<p>Equality duty under the Equality Act 2010</p>	
<p>The Panel must consider the Authority's equality duty under the Equality Act 2010 when considering an application for accreditation. This is also considered under the share your experience discussion above.</p>	<p>The Panel had regard to its duty under the Equality Act 2010 when considering this application for accreditation.</p>

Annex B - Accredited Registers Impact Assessment

	Potential impact on service users, registrants and employers
E.63 - accreditation could set and enhance standards of professional and occupational standards	<p>UKAHPP has undertaken actions to assure itself that it meets the Standards of Accreditation. For example, it has reviewed its governance, updated its policies and procedures and developed its risk matrix.</p> <p>UKAHPP has standards of professional skills and conduct within its Code of Ethical Principles and Code of Practice.</p> <p>In preparing for accreditation the UKAHPP has carried out a risk assessment and described controls to mitigate risk associated with the practice of Humanistic Psychology to service users.</p> <p>Conditions, Instructions and Learning Points</p> <p>The Panel provided the following Conditions to be implemented by the timeframe specified:</p> <ol style="list-style-type: none"> 1. UKAHPP must update its risk matrix to include more fully all risks, such as remote counselling, and all mitigations, such as training, relevant CPD and adherence to the Codes of Conduct. This should be completed within six months of the date of accreditation 2. UKAHPP must develop quality assurance processes to ensure the information on the public register is accurate. This should be completed within six months of the date of accreditation 3. UKAHPP must review the wording and the practicalities of the Complaints Procedure and the Disciplinary Procedure to ensure that it is clear which process will be used and when. This is to be completed and sent to the Accreditation team within six months of the date of accreditation. <p>The Panel provided the following Instructions to be implemented by annual review of accreditation:</p> <ol style="list-style-type: none"> 1. UKAHPP is to notify the Authority if it plans to add new occupations, modalities, categories to its register 2. UKAHPP is to add every registrant who meets its standards on the public register, unless there are exceptional circumstances involving the safety of the registrant. UKAHPP's policy on exceptional

circumstances to allow a registrant to not have their name on the register should be clearly published on the register website

3. UKAHPP is to ensure that requirements for lay membership within the Board are explicit within its governance documents, including a minimum number of lay representatives
4. UKAHPP is to review its website to ensure that the information provided to the public is clear and consistent
5. UKAHPP is to ensure that accredited register status is clearly defined and make clear that it applies to UK registrants only, for example through its website. UKAHPP should monitor how its registrants communicate accreditation. Monitoring should take place throughout accreditation life and an update should be provided at annual review
6. UKAHPP is to inform the team if any complaints hearings are scheduled within the period of accreditation so that it may seek consent to observe a hearing.

The Panel provided the following **Learning Points** to be verified at the next annual review of accreditation:

1. UKAHPP should consider how it could use its updated risk matrix as a tool to record, assess and manage risks
2. UKAHPP should consider documenting its policy for handling conflicts of interest
3. UKAHPP should consider documenting a catastrophe recovery or contingency plan and ensure it has succession planning in place for key roles
4. UKAHPP should consider whether it is appropriate for Board members to be able to sit indefinitely on the Board
5. UKAHPP should consider whether a lay representative should be present at Board meetings where decisions are made and document the requirement within its governance documentation
6. UKAHPP should consider continuing to explore options for engaging service users in what it does
7. UKAHPP should consider adding information to its website about the risks and benefits of humanistic psychology
8. UKAHPP should consider developing further guidance to ensure complaints decisions made by its committees/panels are fair and consistent, for example 'indicative sanctions guidelines'.

E.64 - the Authority's accreditation scheme

The Authority's accreditation scheme is operated on a not-for-profit basis. The fee has been calculated at £13,250 per application (2018-2019 financial year).

operates on a no-for-profit basis	The fees may be affected by the volume of applications. It is possible that the fee may fall in future years if the volume of accredited registers rises.
E. 65 - the Authority's oversight of registers may impose some costs on registers and their registrants.	<p>UKAHPP has paid the Authority £12,485 (fee for 2016-2017 financial year).</p> <p>The Authority has ascertained that the cost of accreditation for the UKAHPP is sustainable over the longer term.</p> <p>UKAHPP currently registers approximately 142 registrants in the UK. UKAHPP does not charge an additional fee above the membership fee for registration. The membership fee for a Full Accredited Member is £200 per annum.</p> <p>Registrants work in a variety of settings including the voluntary and private sectors.</p> <p>It will be of benefit to service users to be able to choose practitioners from a register that has been independently assessed by the Authority as meeting high standards.</p>
E.66 - accreditation should lead to improved standards of education, proficiency and conduct.	<p>UKAHPP meets the standards the Authority has set for education and training, and registrants' personal behaviour, technical competence and business practice.</p> <p>In preparing for accreditation, UKAHPP has developed a Register which requires registrants to have completed at least a Level 5 course in psychotherapy or psychotherapeutic counselling, to sign a good health and conduct declaration annually and to maintain their skills and knowledge through CPD.</p>
E.67 - accreditation should improve the ability of employers and service users to distinguish those who have met nationally accredited standards.	<p>The UKAHPP register is available online at: https://ahpp.org.uk/members-register-list/</p> <p>If accredited, UKAHPP and practitioners on the register may use the Authority's registered accreditation mark. This visual symbol makes it easy for employers and service users to recognise those who meet the Authority's national accreditation standards.</p>

<p>Equality and Diversity - Does the register treat individuals differently or have a different impact on individuals on the basis of age, disability, gender, gender reassignment, pregnancy and maternity, race, religion and belief or sexual orientation?</p>	<p>UKAHPP aims to make its register as inclusive as possible and is open to anyone able to meet its standards for education and adhere to its Codes of Conduct. To qualify for entry into the register a practitioner must demonstrate that they meet UKAHPP's standards of entry to the register.</p>
<p>Small firms impact</p>	<p>There should be minimal impact as the occupation is not market driven.</p>
<p>Competition</p>	<p>There is a risk that registrants could transfer from existing registers to a newly Accredited Register impacting on their competitiveness. We have mitigated this by listing those organisations that are planning to apply for accreditation to help them manage their members' expectations. It is in the public interest for registrants to be on an Accredited Register.</p>
<p>Other</p>	<p>Accrediting UKAHPP is likely to incentivise other Humanistic Psychology Practitioners to improve their skill set and encourage education providers to develop their curricula to provide access to the Accredited Register. This will help to drive up standards of the workforce.</p>