

Accreditation renewal report

Standards 1-8

UK Association of Humanistic Psychology Practitioners

September 2023

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About the UK Association of Humanistic Practitioners (UKAHPP)

The UK Association of Humanistic Practitioners (UKAHPP) registers:

- Psychotherapists
- Psychotherapeutic Counsellors

Its work includes:

- Setting and maintaining standards of practise and conduct
- Maintaining a register of qualified professionals
- Assuring the quality of education and training
- Requiring registrants to keep up their skills up to date through continuing professional development
- Handling complaints and concerns raised against registrants and issuing sanctions where appropriate.

As of 1 January 2023, there were 43 registrants on the UKAHPP's register.

The UKAHPP was first accredited on 7 June 2018.

In August 2023 we renewed UKAHPP's accreditation with Conditions and Recommendations. They will next be due a full assessment against our Standards by August 2026.

About accreditation

The Professional Standards Authority (the Authority) accredits registers of people working in a variety of health and social care occupations that are not regulated by law. To become an Accredited Register, organisations holding registers of unregulated health and social care roles must prove that they meet our *Standards for Accredited Registers* (the Standards).

Initial accreditation decisions are made by an Accreditation Panel following an assessment of the organisation against the Standards by the Accreditation team. The Panel decides whether to accredit an organisation or not. The Panel can also decide to accredit with Conditions and provide Recommendations to the organisation.

- **Condition** – Issued when a Panel has determined that a Standard has not been met. A Condition sets out the requirements needed for the Accredited Register to meet the Standards, within a set timeframe. It may also reduce the period of accreditation subject to a review or the Condition being met.
- **Recommendation** – Actions that would improve practice and benefit the operation of the Register, but which is not a current requirement for accreditation to be maintained.

This assessment was carried out against the *Standards for Accredited Registers* including the new Standard One introduced in 2021 by the Authority and which includes the ‘public interest test’. Standard One checks eligibility under our legislation, and if accreditation is in the public interest. More about how we assess against Standard One can be found in our *Supplementary Guidance for Standard One*¹.

We used the following in our assessment of the UKAHPP:

- Documentary review of evidence of benefits and risk supplied by the UKAHPP and gathered through desk research
- Documentary review of evidence supplied by the UKAHPP and gathered from public sources such as its website
- Due diligence checks
- Share your experience responses
- Assessment of UKAHPP’s complaints procedures.

¹ [Accredited Registers supplementary guidance standard one \(professionalstandards.org.uk\)](https://www.professionalstandards.org.uk)

The Outcome

The Accreditation Panel met on 31 March 2023 and 16 June 2023 to consider the UK Association of Humanistic Psychology Practitioners (UKAHPP). The Panel was satisfied that the UKAHPP could meet with Conditions all the Standards for Accredited Registers.

We therefore decided to renew accreditation with 13 Conditions.

We noted the following **positive findings**:

- The UKAHPP took immediate action to issues raised during the assessment for example by amending their Codes of Practice and demonstrated their commitment to reviewing their complaints processes as required.

We issued the following Conditions to be implemented by the deadline given:

Conditions		Deadline
Standard 1	1. The UKAHPP's obsolete website must be taken offline within three months of publication of this decision. Until that website is removed, the UKAHPP must publish a clear statement on its current website (within one month) informing the public that the old one is out of date and should be disregarded.	Three months / One month
	2. The UKAHPP must provide guidance for its registrants on how to identify and take appropriate action when any safeguarding concern is raised.	Six months
	3. The UKAHPP must make clear within its Code of Practice that registrants must not offer or provide Conversion Therapies.	Three months
	4. The UKAHPP must make clear that screening clients based on protected characteristics is unacceptable and may result in disciplinary action should it become aware of registrants doing so.	Three months
	5. The UKAHPP must publish a clear description of what humanistic psychotherapy is, with reference to a relevant evidence base. This must include setting out its benefits, and limitations.	Six months
Standard 2	6. People accessing the UKAHPP's register should be clear about the qualification held by registrants. The UKAHPP must publish or direct those accessing the register to the qualifications required for its categories of registration.	Six months
	7. The UKAHPP must improve the accessibility of its public register by providing information about all	Six months

	<p>headings and terms that can be accessed from the register and its supporting webpage.</p> <p>8. The UKAHPP must clearly set out its requirements and standards for the registration of psychotherapeutic counsellors working with children and young people.</p> <p>9. The UKAHPP must introduce a proportionate system of checks to assure that registrants' website and advertising meets its standards.</p>	<p>Six months</p> <p>Six months</p>
Standard 5	<p>10. The UKAHPP must improve presentation of its complaints procedures to assure these are accessible and clear to all parties.</p> <p>11. The UKAHPP must change its complaints process to make clear that it assumes responsibility for investigating and prosecuting complaints, with the complainant as witness rather than prosecutor in cases that reach the threshold for formal hearings.</p>	<p>Six months</p> <p>Six months</p>
Standard 6	<p>12. The UKAHPP must implement tools and processes to assist its identification and mitigation of new risks that could affect its ability to operate the register.</p>	<p>Six months</p>
Standard 7	<p>13. The UKAHPP must implement tools and processes to assist its identification and mitigation of new risks to the public occurring within registrants' practice.</p>	<p>Six months</p>

We issued the following Recommendations to be considered by the next review:

Recommendations	
Standard 2	<p>1. The UKAHPP should provide further information on the register to assure that those accessing the register understand the difference between registrant and student members.</p> <p>2. The 'Find A Therapist' directory should provide information such as registrants' unique ID numbers, any active sanctions and a link to their register entry.</p> <p>3. If the Affiliate category is reintroduced, the UKAHPP must clearly state which UKAHPP and UKCP standards these practitioners adhere to.</p>
Standard 4	<p>4. The UKAHPP should provide further guidance for those seeking to apply to the register through its portfolio route or other forms of Accreditation of Prior Experience and Learning (APEL).</p>
Standard 5	<p>5. The UKAHPP should provide guidance on what kinds of concern are appropriate to resolve through mediation.</p>

	<p>6. The UKAHPP should allow registrants to have legal representation during complaints hearings. Registrants should be advised of this right when complaints processes are initiated.</p> <p>7. The UKAHPP should make clear in its complaints process that people involved in Appeals and Review Panels will have had no previous role in the complaints process.</p> <p>8. The UKAHPP should consider appropriate intervals for reviewing interim orders issued during complaints processes.</p> <p>9. The UKAHPP should provide further guidance on criteria for appeals processes.</p>
Standard 6	10. The UKAHPP could improve its transparency and accessibility by displaying information about Board and committee members.
Standard 8	11. The UKAHPP should identify groups who have a clear interest in its policies and processes, including service users, to ensure that there are mechanisms to consult and take account of their feedback.

About the Register

This section provides an overview of the UKAHPP and its register.

Name of Organisation	UK Association of Humanistic Psychology Practitioners (UKAHPP)
Website	https://ahpp.org.uk/
Type of Organisation	The UKAHPP is a private company limited by guarantee without share capital (Company number 04041226)
Role(s) covered	Humanistic Psychotherapists and Psychotherapeutic Counsellors (Humanistic practitioners)
Number of registrants	43
Overview of Governance	Board of Directors including lay membership, assisted by committees.
Overview of the aims of the register	<p>The UKAHPP's stated objectives are:</p> <ul style="list-style-type: none"> • 'To maintain a specialist professional organization of good standing, with ethical codes and other membership conditions, for the overall benefit of members in private practice and other forms of employment as humanistic practitioners • To ensure a consistent and professional standard of practitioners • The inclusive and mutual support of its members and the advancement of their learning and development • The critical support of current and future practices and developments in the application of humanistic psychology • To represent the interests of humanistic psychology and relevant members / practitioners in the UK • To promote and advance public awareness about humanistic theories and practices'

Inherent risks of the practice

This section uses the criteria developed as part of the Authority's *Right Touch Assurance tool*² to give an overview of the work of humanistic practitioners.

Risk criteria	
1. Scale of risk associated with humanistic practitioners.	

² [Right-touch assurance: a methodology | PSA \(professionalstandards.org.uk\)](https://professionalstandards.org.uk/)

<p><i>a. What do humanistic practitioners do?</i></p> <p><i>b. How many humanistic practitioners are there?</i></p> <p><i>c. Where do humanistic practitioners work?</i></p> <p><i>d. Size of actual/potential service user group</i></p>	<p>a. The UKAHPP describes humanistic approaches to counselling and psychotherapy and includes modalities such as: client/person-centred, experiential, Gestalt, Transactional Analysis, Psychodrama, Body Work, Art and Dance and Transpersonal.</p> <p>b. As of 1 January 2023, there were 43 humanistic psychologists on the UKAHPP's register.</p> <p>c. The UKAHPP describes humanistic approaches as being one of the most commonly practised approaches in the UK. Although there is potential for service services to be referred by a GP, it appears that most people would access a humanistic psychologist as an independent practitioner.</p> <p>d. It is estimated that 1 in 6 people a week in England experience a common mental health problem (NHS Digital, 2014). Due to the nature of their work, humanistic practitioners could potentially be treating people across any demographic, within the UK. However, the fact that it not currently offered as a mainstream NHS service is likely to limit accessibility.</p> <p>Except in limited circumstances, the UKAHPP registers practitioners working with adults. Applicants seeking to work with children and young people are advised to seek appropriate accreditation through other organisations.</p>
<p>2. Means of assurance</p>	<p>Practitioners who are not registered with the UKAHPP may be registered with another Accredited Register, or a non-accredited professional association. However, registration is not essential. We do not have data on the number of UKAHPP registrants that are likely to be employed, and so it is difficult to ascertain how relevant employer controls are for this group. The likelihood of registrants working independently means that they may not have been subject to an enhanced criminal records check.</p>
<p>3. About the sector in which humanistic practitioners operate</p>	<p>It is anticipated that most of the UKAHPP's registrants work in the independent sector.</p>
<p>4. Risk perception</p> <ul style="list-style-type: none"> • <i>Need for public confidence in humanistic practitioners?</i> • <i>Need for assurance for employers or other stakeholders?</i> 	<p>As most registrants are self-employed, it is important that members of the public have confidence in the practitioners they choose to deliver therapy. The broad range of modalities offered by humanistic practitioners, many of which may not be available as part of mainstream NHS services, make it important that the public are aware of what to expect from practitioners.</p>

Assessment against the Standards

Standard One: Eligibility and 'public interest test'

Summary

- 1.1 The Accreditation Panel found that the UKAHPP's register falls within the scope of the Accredited Registers programme.
- 1.2 The Accreditation Panel found it is in the public interest to have registers of practitioners who meet appropriate standards of competence, conduct, and business practice, as required by the UKAHPP.
- 1.3 We considered that the humanistic therapy treatments performed by UKAHPP registrants can be beneficial.
- 1.4 The Accreditation Panel found that Standard One is met, with the following Conditions:

Condition(s):

1. The UKAHPP's obsolete website must be taken offline within three months of publication of this decision. Until that website is removed, the UKAHPP must publish a clear statement on its current website informing the public that the old one is out of date and should be disregarded. That statement should be published within one month of publication of this decision.
2. The UKAHPP must provide guidance for its registrants on how to identify and take appropriate action when any safeguarding concern is raised. This is to be completed within six months.
3. The UKAHPP must make clear within its Code of Practice that registrants must not offer or provide Conversion Therapies. This must be completed within three months.
4. The UKAHPP must make clear that screening clients based on protected characteristics is unacceptable and may result in disciplinary action should it become aware of registrants doing so. This must be completed within three months.
5. The UKAHPP must publish a clear description of what humanistic psychotherapy is, with reference to a relevant evidence base. This must include setting out its benefits, and limitations. This must be completed within six months.

Accreditation Panel findings

Standard 1a: Eligibility

- 1.5 We considered whether the UKAHPP's register falls under the scope of our powers of accreditation as set out in the National Health Service Reform and Health Care Professions Act 2002, making reference to the definition of a 'voluntary register' set out at Section 25E.
- 1.6 The UKAHPP's registrants, working as humanistic therapists, provide psychotherapy and psychotherapeutic counselling services. This consists of using talking and related therapies with their clients. The UKAHPP explained

to us that 'Humanistic Psychotherapy is a helping relationship for people with mild and moderate psychological distress, who have sufficient free attention outside of their distress in order to allow them to integrate more fully the significance of past and present experiences into awareness'.

- 1.7 'Humanistic psychology' is not within the range of protected practitioner psychologist titles under regulation by the Health and Care Professions Council (HCPC)³.
- 1.8 The UKAHPP operates a public register of practitioners that meet its standards. This is published on the main UKAHPP website, which also provides information about humanistic therapies and the UKAHPP's work.
- 1.9 We found that the UKAHPP's register falls within the scope of the Accredited Registers programme and meets the requirements of Standard 1a.
- 1.10 During our assessment we found that an obsolete version of the UKAHPP register website remained online. We were concerned that people could access the register on that website and receive incorrect information about practitioners. We were also concerned that membership categories on that site included 'Art Therapist' and other legally protected titles. The UKAHPP confirmed that those titles had been removed before its original application for accreditation, and that it was acting to take down the outdated website. We considered that while that register remained online, people could receive incorrect information about the register and its registrants. This undermined the UKAHPP's current register, and its ability to protect the public, by presenting incorrect and misleading information.
- 1.11 The Accreditation Panel issued the following Condition:
 - The UKAHPP's obsolete website must be taken offline within three months of publication of this decision. Until that website is removed, the UKAHPP must publish a clear statement on its current website informing the public that the old one is out of date and should be disregarded. That statement should be published within one month of publication of this decision.
- 1.12 Prior to publication of this report, the UKAHPP published an initial statement on its current website, and has provided regular updates on the actions it is taking to take down the obsolete website.

Standard 1b: Public interest test

i. Evidence that the activities carried out by registrants are likely to be beneficial.

- 1.13 We considered whether it is likely to be in the best interests of patients, service users and the public to accredit the UKAHPP's register, with consideration of the types of activities practised by its registrants.
- 1.14 Our assessment checked for evidence that the activities carried out by registrants are likely to be beneficial. We noted there is good evidence that counselling and psychotherapy-based interventions provide benefits to

³ <https://www.hcpc-uk.org/about-us/who-we-regulate/the-professions/>

individuals both in terms of increased functioning and quality of life.

1.15 We noted studies that found a humanistic approach to counselling and psychotherapy may result in higher levels of client satisfaction. This was more likely to result in clients' completion of treatment and better therapeutic outcomes.

1.16 We noted that other practices present within humanistic therapies, such as *Bodypsychotherapy (BPT)* may lead to 'significant improvements in body image and significant reductions in interpersonal difficulties and appearance-based conversations' although high-quality studies with bigger samples were required to underpin this. Other studies found that BPT may help people who chronic depression who have not responded to other available treatments, and that it may lead to significant improvements.

ii. Evidence that any harms or risks likely to arise from the activities are justifiable and appropriately mitigated by the register's requirements for registration.

1.17 The UKAHPP's risk register included awareness and mitigation for risks relating to the practices of registrants. We noted these were relevant to the broad practices of counselling and psychotherapy, such as those relating to sexual exploitation or other boundary violations.

1.18 We considered the UKAHPP's approach to identifying and acting on risks under *Standard Seven: Management of risks arising from the activities of registrants*.

1.19 The UKAHPP noted that some therapies practised by registrants, such as BPT, will involve touch. The risk of boundary violations is mitigated through UKAHPP-approved training, undertaking appropriate clinical supervision, and adherence to its Code of Practice and Ethical Principles.

1.20 Risks relating to the potential harm that can be caused by power imbalances between the practitioner and client were also mitigated by requirements to follow the UKAHPP's Code of Practice and Ethical Principles.

1.21 The UKAHPP demonstrated awareness of risks relating to safeguarding. We require registers to have processes for handling safeguarding concerns, signposting to the appropriate authorities as required. We considered that the UKAHPP should better assist its registrants to identify and act on safeguarding concerns, by providing guidance on the actions that must be taken..

1.22 The Accreditation Panel issued the following Condition:

- The UKAHPP must provide guidance for its registrants on how to identify and take appropriate action when any safeguarding concern is raised. This is to be completed within six months.

1.23 We call treatment outside of registers' main scope of practice 'adjunctive therapies'. An example of these might be the use of complementary therapies such as acupuncture within counselling sessions. We considered that as registrants may practise various forms of creative arts therapies within their

humanistic work, there was an increased risk that clients may not be aware if they are receiving humanistic treatment or an adjunctive therapy outside of the UKAHPP's scope.

- 1.24 We noted that the UKAHPP mitigated the risk of registrants providing adjunctive therapies, or interventions outside of those within the humanistic scope of practice, by requiring that clients are given adequate information about treatments provided within the initial contracting process to enable them to give informed consent. Registrants will be in breach of the UKAHPP's Codes if they offer services they are not qualified and competent to provide and may be subject to complaints processes.
- 1.25 The UKAHPP has recently amended its Code of Practice to make clear that registrants must consider alternative treatment, including referral to another practitioner, should the needs of their client be beyond their competence.
- 1.26 We were concerned that the UKAHPP did not make explicit reference to the risk of registrants practising conversion therapy. Conversion therapy is the term for therapy that assumes certain sexual orientations or gender identities are inferior to others and seeks to change or suppress them on that basis. We noted that the UKAHPP was not a signatory to *The Memorandum of understanding on conversion therapy in the UK*⁴ (the MOU). That agreement aims to protect the public by making sure that healthcare professionals and psychological therapists are aware of the ethical issues relating to conversion therapy, amongst others. It is signed by many of the ARs, and other bodies such as the NHS and the mental health charity Mind.
- 1.27 The PSA will not accredit any register that permits conversion therapy⁵. We noted that although the UKAHPP stated that its Codes and ethos aligned with the MOU, this was not necessarily clear to people seeking the services of its registrants. The UKAHPP has since added a section to its Code making clear that the 'UKAHPP does not offer or provide Conversion Therapy'. We noted the action taken however considered that the UKAHPP should make its Code explicitly clear that its registrants do not offer or provide conversion therapies.

The Accreditation Panel issued the following Condition:

- The UKAHPP must make clear within its Code of Practice that registrants must not offer or provide Conversion Therapies. This must be completed within three months.
- 1.28 During our assessment, we noted that one registrant's website stated that they were unwilling to work with clients possessing certain protected characteristics. Whilst it can be appropriate for practitioners to be clear about their areas of specialism and the limits of their competence, we were concerned that rejecting clients based on protected characteristics could be direct or indirect discrimination, or could be perceived as discriminatory.
 - 1.29 We noted that the registrant's position appeared to conflict with the UKAHPP

⁴ [Memorandum of understanding on conversion therapy in the UK \(bacp.co.uk\)](https://www.bacp.co.uk/mou)

⁵ [PSA | publishes statement to support MoU on conversion therapy \(professionalstandards.org.uk\)](https://www.professionalstandards.org.uk/psa)

Codes, which stated:

‘Registrants undertake to develop their ability to offer a service that is equally respectful, accessible and beneficial to all people regardless of mental or physical disability, sexual orientation, race, colour, gender, age, class, religion, national origin, marital status, political or cultural beliefs, or any other preference, personal characteristic, condition or status.’

- 1.30 We considered that registrants must be able to express limitations in a non-discriminatory way and that Accredited Registers should address such matters with guidance or disciplinary action as required. We did not find evidence of similar statements by other registrants but required assurance that the UKAHPP could address issues like these when they were identified.

The Accreditation Panel issued the following Condition:

- The UKAHPP must make clear that screening clients based on protected characteristics is unacceptable and may result in disciplinary action should it become aware of registrants doing so. This must be completed within three months.

iii. Evidence of commitment to providing accurate information about treatments and services.

- 1.31 Some information about the humanistic approach to psychotherapy is also set out on the UKAHPP’s register website. We noted statements critical of the National Institute for Health and Care Excellence (NICE) on the UKAHPP website. These suggested NICE supported an ‘illness model of mental health and a symptom reduction research paradigm’ that conflicted with the humanistic approach to therapy. Although this stance may be seen as backing a humanistic method, and other stakeholders have raised concerns with NICE for not adequately recognising the efficacy of counselling and psychotherapy in treating depression, we considered there was a potential risk that UKAHPP’s statements may dissuade people from seeking necessary medical treatment.

- 1.32 We also considered that although the UKAHPP’s website provided a history and discussion of humanistic counselling and psychotherapies, there did not appear to be a clear description of its core, or associated, practices. As some registrants advertised, for example, being able to help people with eating disorders and ‘high intensity’ Post Traumatic Stress Disorder (PTSD), we considered that UKAHPP should more clearly defined its scope and evidence base.

The Accreditation Panel issued the following Condition:

- The UKAHPP must publish a clear description of what humanistic psychotherapy is, with reference to a relevant evidence base. This must include setting out its benefits, and limitations. This must be completed within six months.

Standard 2: Management of the register

Summary

The Accreditation Panel found that Standard Two was met. It issued the following Conditions and Recommendations:

Conditions:

1. People accessing the UKAHPP's register should be clear about the qualification held by registrants. The UKAHPP must publish or direct those accessing the register to the qualifications required for its categories of registration. This must be implemented within six months.
2. The UKAHPP must improve the accessibility of its public register by providing information about all headings and terms that can be accessed from the register and its supporting webpage. This must be implemented within six months.
3. The UKAHPP must clearly set out its requirements and standards for the registration of psychotherapeutic counsellors working with children and young people. This must be completed within six months.
4. The UKAHPP must introduce a proportionate system of checks to assure that registrants' website and advertising meets its standards. This must be implemented within six months.

Recommendations:

1. The UKAHPP should provide further information on the register to assure that those accessing the register understand the difference between registrant and student members.
2. The 'Find A Therapist' directory should provide information such as registrants' unique ID numbers, any active sanctions and a link to their register entry.
3. If the Affiliate category is reintroduced, the UKAHPP must clearly state which UKAHPP and UKCP standards these practitioners adhere to.

Accreditation Panel findings

- 2.1 The UKAHPP operates a public register for humanistic psychotherapists and psychotherapeutic counsellors working in the field of humanistic psychology. Their register is published at: <https://ahpp.org.uk/register-of-psychotherapists-and-psychotherapeutic-counsellors/>.
- 2.2 The register is a regularly updated spreadsheet that displays registrants' names, identification numbers, categories of registration, professional description, practice status, registration with other bodies, and active sanctions. The complete register may be downloaded at any time.
- 2.3 Within Standard One we issued a Condition requiring the UKAHPP to remove an out-of-date register website, and to clearly highlight the status of that register, on its current website.
- 2.4 We reviewed the UKAHPP's register against our [Accredited Registers Evidence Framework for Standards](#). We noted that although the UKAHPP

states the required qualifications for registration on its website, our framework requires related information to be accessible from the register. The UKAHPP's register publishes the individual registrants' register categories, but not type of qualification. Levels of qualification were not signposted from the register or immediately surrounding webpages.

The Accreditation Panel issued the following Condition:

- People accessing the UKAHPP's register should be clear about the qualification held by registrants. The UKAHPP must publish or direct those accessing the register to the qualifications required for its categories of registration. This must be implemented within six months.

2.5 We noted that the UKAHPP register has a separate section for trainee student members on approved courses. That section states that 'Student members observe the UKAHPP Code of Practice and are governed by the university's complaints procedure' however we suggested that further information could be provided to distinguish students from registrants.

The Accreditation Panel issued the following Recommendation:

- The UKAHPP should provide further information on the register to assure that those accessing the register understand the difference between registrant and student members.

2.6 Overall, we did not think it was easy for the public to understand all of the headings listed on the published register, for example the difference between levels of membership and of registration. We considered that people may not be able to understand when a registrant's practice status indicated they were under sanction by the UKAHPP or another register. The website's 'Categories membership, registration and accreditation' were not easy to navigate or clearly linked to the public register. The inclusion of 'A Glossary of Terms' in the published register spreadsheet would aid understanding.

2.7 We also noted inconsistencies between the UKAHPP's processes and what was published on the register. For example its procedure states that registration is open to 'to Psychotherapists and Psychotherapeutic Counsellors working with adults in the UK only'; however we noted that there were practitioners on the published register marked as 'Overseas – No UK practice'.

The Accreditation Panel issued the following Condition:

- The UKAHPP must improve the accessibility of its public register by providing information about all headings and terms that can be accessed from the register and its supporting webpage. This must be implemented within six months.

2.8 The UKAHPP also publishes its Find A Therapist Directory at: <https://ahpp.org.uk/find-a-therapist/>. Registrants (not including 'Entry Level Registered Members') may choose to be listed on the directory to advertise their services and contact details. We noted this service could be mistaken for the UKAHPP's register.

The Accreditation Panel issued the following Recommendation:

- The 'Find A Therapist' directory should provide information such as registrants' unique ID numbers, any active sanctions and a link to their register entry.
- 2.9 The UKAHPP states that it does not register child counsellors and psychotherapists. We noted however that its Registration and Accreditation Criteria states that it will register 'School or Student Counsellors working with a recognised child/family agency or education authority. Such practitioners 'must meet the published criteria and evidence that their employer provides training, management and supervision separate from line management.' We considered that this appeared to conflict with the UKAHPP's other published information. It was not clear to us whether the UKAHPP would investigate complaints against registrants for work in such settings.

The Accreditation Panel issued the following Condition:

- The UKAHPP must clearly set out its requirements and standards for the registration of psychotherapeutic counsellors working with children and young people. This must be completed within six months.
- 2.10 Practitioners may apply to join the UKAHPP's register by submitting an application for Entry Level, Registered, or Accredited Registered Membership⁶. The lowest level of registration, 'Entry Level' is not endorsed to work in private practice and cannot be included on the 'Find a Therapist' directory. Entry Level registrants are required to advance to Registered or higher-level membership within two years of registration.
- 2.11 The UKAHPP is an Organisational Member of the UK Council for Psychotherapy (UKCP) and its standards comply with the UKCP's standards of education and training⁷. UKAHPP-accredited registrants qualify to register with the UKCP. When dual-registered they must meet the standards of both bodies, however concerns raised will be considered under the UKCP's complaints procedure. UKCP complaints decisions will be reflected by the UKAHPP.
- 2.12 At the time of assessment, the UKAHPP had two further membership categories: Associate members, who are non-registrants with an interest in humanistic psychology, and Affiliate members, which facilitates registrants from other UKCP Member Organisations to hold dual registration. The UKAHPP advised this was a dormant category under review.

The Accreditation Panel issued the following Recommendation:

- If the Affiliate category is reintroduced, the UKAHPP must clearly state which UKAHPP and UKCP standards these practitioners adhere to.
- 2.13 We noted that potential applicants might have difficulty finding information relating to their intended category of registration: The <https://ahpp.org.uk/how->

⁶ [Registration and Accreditation Criteria and Application | UKAHPP](#)

⁷ <https://www.psychotherapy.org.uk/ukcp-members/standards-guidance-and-policies/>

[to-join/](#) page, for example, highlights the non-registered Associate membership, and also honorary classes of membership awarded to senior registrants, such as 'Honorary Life Membership'. Information on 'Entry Level' registration is found on the 'Registration, Accreditation Criteria and Application' page.

The Accreditation Panel issued the following Recommendation:

- The UKAHPP should review its registration pathways to assure these are clear to practitioners who wish to join its register.
- 2.14 UKAHPP registrants commit to a minimum of 250 hours of CPD over 'any five-year period, with at least 20 hours in any single year.' The UKAHPP Registrar's Office checks practitioners at point of application and conducts a random sample audit of annual renewals to assure that registrants are meeting CPD and evidence of practice requirements, in line with its *Continuing Professional Development and Supervision Policy*⁸. We considered that given the concerns raised about a registrant's website, and the types of treatments advertised by some registrants, that the UKAHPP should also undertake sample checks of registrants' websites and other public presentation.

The Accreditation Panel issued the following Condition:

- The UKAHPP must introduce a proportionate system of checks to assure that registrants' website and advertising meets its standards. This must be implemented within six months.

Standard 3: Standards for registrants

Summary

The Accreditation Panel found that Standard Three was met.

Accreditation Panel findings

3.1 The UKAHPP sets standards for competence, professional and ethical behaviour, and business practice. Chief among these is the UKAHPP's Code of Practice and Ethical Principles (the Codes). The Codes reflect the values and principles of humanistic practice, for example by emphasising the need for informed consent, client autonomy, and the practitioner's responsibility to promote the client's self-determination and self-development.

i. Standards of Competence

3.2 Standards of competence are based on Skills for Health's National Occupational Standards⁹ for humanistic therapies. These are applied to the UKAHPP's registration and accreditation criteria. Registrants are required by the UKAHPP's Codes to work only within their competence and may not offer services for which they are not qualified.

⁸ <https://ahpp.org.uk/continuing-professional-development-and-supervision-policy/>

⁹ <https://www.skillsforhealth.org.uk/info-hub/national-occupational-standards-overview/>

ii. Standards of conduct

- 3.3 The Codes require registrants to ‘conduct themselves in a manner that maintains the integrity of their practice and of the UKAHPP and are always respectful, courteous and honest towards colleagues and of other professions and modalities’.
- 3.4 We also noted that registrants are required to:
- ‘develop their ability to offer a service that is equally respectful, accessible and beneficial to all people regardless of mental or physical disability, sexual orientation, race, colour, gender, age, class, religion, national origin, marital status, political or cultural beliefs, or any other preference, personal characteristic, condition or status.’
- 3.5 While not a regulated profession, the Codes requires registrants to act in accordance with duty of candour; to be honest and trustworthy when things go wrong. They must take steps to apologise and correct matters where necessary.

iii. Standards of business practice

- 3.6 The Codes set out requirements for appropriate business practice, for example to fully inform clients of the purpose and nature of the services they offer. The Codes set out the UKAHPP’s requirements for information sharing, data handling and confidentiality, including creating a ‘Confidentiality Agreement with clients at the onset of therapy, as means of safeguarding client privacy’.
- 3.7 We require registers to assure that their registrants’ advertising is in line with Advertising Standards Authority guidance and rulings, and legislation such as the Cancer Act 1939. During our assessment we were not sure that the UKAHPP was explicit about its standards for registrants’ advertising of services. The UKAHPP has amended its Codes to make clear that registrants must represent themselves appropriately in ‘all physical and online marketing and advertising information’. The UKAHPP confirmed it can consider concerns about registrants’ advertising within its complaints procedures.
- 3.8 We checked if the UKAHPP provides guidance on the use of products and equipment by registrants, and any additional modalities, or adjunctive therapies, that they may use. The UKAHPP advised that registrants using products (such as in art and body therapies) are expected to take precautions to reduce related risks, such as possible allergic reactions, by discussing with their clients and holding appropriate indemnity insurance. Adjunctive therapies are not covered within the UKAHPP scope of registration although complaints about such services provided by registrants will be accepted.

Standard 4: Education and training

The Accreditation Panel found that Standard Four was met. It issued the following Recommendation:

Recommendations:

1. The UKAHPP should provide further guidance for those seeking to apply to the register through its portfolio route or other forms of Accreditation of Prior Experience and Learning (APEL).

Accreditation Panel findings

- 4.1 The UKAHPP's standards of education and training are based on National Occupational Standards (NOS) for Counselling and Psychotherapy relating to Humanistic Therapies. These are published on the UKAHPP's website¹⁰.
- 4.2 Psychotherapists and psychotherapeutic counsellors wishing to join the UKAHPP register must meet published minimum criteria set by its Accreditation Committee¹¹. Psychotherapists seeking UKAHPP-accreditation and entry to its register, for example, must hold a Masters level qualification in a Humanistic Psychotherapy approach or an equivalent portfolio. Psychotherapeutic Counsellors must demonstrate graduate level training or equivalent.
- 4.3 Applications are considered by the UKAHPP's Membership and Accreditation Committees against the criteria. We noted that applicants who could not evidence the required qualifications could provide a portfolio equivalent. The Accreditation Panel suggested that further information about equivalence applications could be provided for the benefit of applicants.
- 4.4 The Accreditation Panel issued the following Recommendation:
 - The UKAHPP should provide further guidance for those seeking to apply to the register through its portfolio route or other forms of Accreditation of Prior Experience and Learning (APEL).
- 4.5 UKAHPP-accredited practitioners may also be eligible for registration with the United Kingdom Council for Psychotherapy (UKCP) through its Humanistic and Integrative Psychotherapy College (HIPC)¹². Requirements for accrediting bodies are set out on the UKCP's website¹³. We noted that the UKAHPP's membership of HIPC and alignment with the standards of another Accredited Register could provide assurance of its training standards.

Standard 5: Complaints and concerns about registrations

The Accreditation Panel found that Standard Five was met. It issued the following Conditions and Recommendations:

Condition(s):

1. The UKAHPP must improve presentation of its complaints procedures to assure these are accessible and clear to all parties. This must be completed within six months.

¹⁰ <https://ahpp.org.uk/national-occupational-standards-2/>

¹¹ [1. Psychotherapist Accreditation | UKAHPP](#)

¹² <https://www.psychotherapy.org.uk/about-ukcp/how-we-are-structured/ukcp-colleges/humanistic-and-integrative-psychotherapy-college-hipc/>

¹³ <https://www.psychotherapy.org.uk/media/3tmm5ddx/ao-omr-form-accrediting-only-questionnaire-2019-final.docx>

2. The UKAHPP must change its complaints process to make clear that it assumes responsibility for investigating and prosecuting complaints, with the complainant as witness rather than prosecutor in cases that reach the threshold for formal hearings. This must be completed within six months.

Recommendations:

1. The UKAHPP should provide guidance on what kinds of concern are appropriate to resolve through mediation.
2. The UKAHPP should allow registrants to have legal representation during complaints hearings. Registrants should be advised of this right when complaints processes are initiated.
3. The UKAHPP should make clear in its complaints process that people involved in Appeals and Review Panels will have had no previous role in the complaints process.
4. The UKAHPP should consider appropriate intervals for reviewing interim orders issued during complaints processes.
5. The UKAHPP should provide further guidance on criteria for appeals processes.

Accreditation Panel findings

- 5.1 The UKAHPP's website invites people to raise any concerns about registrants through the *UKAHPP Complaints Procedure*¹⁴, which is managed by its Ethics Committee. The process consists of:
 1. Acknowledgement by the UKAHPP General Secretary, who may issue interim sanctions against the registrant if necessary.
 2. Investigation by the Ethics Committee to determine if the complaint is valid and if there is a case to answer.
 3. A mediation process, if considered appropriate by the Ethics Committee and agreed to by all parties.
 4. A hearing before an Adjudication Panel, including lay membership.
 5. Appeal and review panels, as required, following the issue of a sanction.
- 5.2 As an Organisational Member of the UKCP, concerns about a practitioner registered with both bodies will be managed under the UKCP Central Complaints Procedure (CCP). The UKAHPP will accept and reflect decisions made under that process.
- 5.3 Complaints outcomes are published on the UKAHPP website. Sanctions issued or mirrored by the UKAHPP are noted on its register entries. The UKAHPP has signed the Accredited Registers Information Sharing Protocol and will inform other registers when sanctions are issued.
- 5.4 The UKAHPP employs an 'external moderator', who is not a member or registrant, to manage appeals against its complaints decisions. They will chair reviews or hearings under the appeals process. Any recommendations

¹⁴ <https://ahpp.org.uk/complaints-procedure-2/>

resulting from appeals will be passed to the UKAHPP Board and Ethics Committee.

- 5.5 The UKAHPP assures that outcomes are proportionate and consistent through, for example, the use of 'Indicative Sanctions Guidance'. Complaints outcomes are reported to the UKAHPP Board so that lessons learned can be acted on.
- 5.6 The UKAHPP employs laypeople as Mediators, and within its Adjudication, Appeals, and Review Panels.
- 5.7 UKAHPP will provide 'confidential facilitators' to assist both complainants and witnesses through the complaints process. Parties may be accompanied to hearings by their Facilitator, colleague or 'McKenzie Friend'¹⁵. The Complaints Procedure also states that it will adapt its published procedure with regards to any 'physical and mental health equality requirements'. The UKAHPP told us that it was working on guidance for witnesses.
- 5.8 We noted that the UKAHPP offers mediation to resolve concerns when agreed to by the involved parties and considered appropriate by the Ethics Committee. We considered it would be appropriate to set out the kinds of issues that may be resolved through mediation.
- 5.9 The Panel issued the following Recommendation:
 - The UKAHPP should provide guidance on what kinds of concern are appropriate to resolve through mediation.
- 5.10 The UKAHPP has an alternate *Disciplinary Procedure* which considers concerns about UKAHPP officers and categories of membership that are not included on its register. It is intended to address concerns that do not involve public protection or registrants' fitness to practise. Concerns may be transferred to the main Complaints Procedure where appropriate. We were concerned about the presentation of the procedure and noted there was a risk that the Disciplinary Procedure could be confused with the Complaints Procedure by those wishing to raise concerns.
- 5.11 We noted that links on the UKAHPP's website were not always clear, for example a link on the 'Raising Concerns and Making a Complaint' webpage about raising concerns against registrants led to the UKAHPP's organisational complaints procedure. We considered that this and the above made it hard to access and navigate to the appropriate complaints procedure.
- 5.12 The Accreditation Panel issued the following Condition:
 - The UKAHPP must improve presentation of its complaints procedures to assure these are accessible and clear to all parties. This must be completed within six months.
- 5.13 Our Standards require that where a complaint is heard before a formal panel, the complainant's role should be that of a witness. They may be questioned

¹⁵ <https://mckenzie-friend.org.uk/>: Someone engaged to assist in hearings by for example, providing support and taking notes, but not litigating on a party's behalf.

by the register, and registrant's representatives, but should not be responsible for arguing how the register's standards have been breached.

- 5.14 We were concerned that the UKAHPP's Complaints Procedure requires the complainant to state their concerns at hearings and to ask questions of the registrant (through the UKAHPP's Panel). Only in exceptional circumstances will parties be heard separately, or without asking questions of the other parties (such as where concerns are of a sexual nature). We think it is inappropriate for complainants to do so as they should not be responsible for making arguments about how the UKAHPP's Codes have been breached; that should be the responsibility of the UKAHPP. There is a risk that requiring the parties to address each other in some fashion could cause distress and dissuade people from raising concerns.
- 5.15 The Accreditation Panel issued the following Condition:
- The UKAHPP must change its complaints process to make clear that it assumes responsibility for investigating and prosecuting complaints, with the complainant as witness rather than prosecutor in cases that reach the threshold for formal hearings. This must be completed within six months.
- 5.16 The Complaints Procedure currently allows registrants to be represented by a recognised trade union or professional organisation at their own expense. We considered that due to the potential impact of outcomes of the complaints process, registrants may potentially wish to be advised and represented by legal counsel.
- 5.17 The Accreditation Panel issued the following Recommendation:
- The UKAHPP should allow registrants to have legal representation during complaints hearings. Registrants should be advised of this right when complaints processes are initiated.
- 5.18 We noted that participation of a registrant's legal representative to assist or speak for the registrant reinforced the need for the complainant to act as witness, rather than prosecutor.
- 5.19 We checked whether decision making in complaints decisions is separate from UKAHPP's governance. We noted that the complaints procedure requires parties to declare potential conflicts of interest. People will be ineligible to participate in procedures where conflicts are found. We noted that the procedure states that facilitators and Adjudication Panel members will have had no previous involvement with either party.
- 5.20 The Accreditation Panel issued the following Recommendation:
- The UKAHPP should make clear in its complaints process that people involved in Appeals and Review Panels will have had no previous role in the complaints process.
- 5.21 The UKAHPP may issue Interim Suspension Orders for protection of the public. We noted that although these are reviewed at each stage of the Complaints Procedure, there is no right of appeal. We considered there may be circumstances where it may be appropriate to allow appeals, or request a

review of the order, for example where there have been significant delays to the process.

5.22 The Accreditation Panel issued the following Recommendation:

- The UKAHPP should consider appropriate intervals for reviewing interim orders issued during complaints processes.

5.23 The UKAHPP's Ethics Committee is responsible 'for the administration and processing of complaints about the professional practice of UKAHPP members'. This includes that they will 'determine if a complaint is valid and whether there is a case to answer by weighing the allegations made against the UKAHPP Code of Practice and Ethical Principles (the Code)'. The Ethics Committee has other functions including appointment of Adjudication Panels. The UKAHPP confirmed that Ethics Committee members do not sit on Adjudication Panels.

5.1 We noted that the 'Appeal Panel Review' process for determining if due process was not followed, or sanctions orders were 'unfair or disproportionate' was not set out clearly.

5.24 The Accreditation Panel issued the following Recommendation:

- The UKAHPP should provide further guidance on criteria for appeals processes.

Standard 6: Governance

The Accreditation Panel found that Standard Six was met. It issued the following Conditions and Recommendations:

Condition:

1. The UKAHPP must implement tools and processes to assist its identification and mitigation of new risks that could affect its ability to operate the register. The UKAHPP must show how this Condition has been addressed within six months.

Recommendation:

1. The UKAHPP could improve its transparency and accessibility by displaying information about Board and committee members.

Accreditation Panel findings

6.1 The UKAHPP is a Private Limited Company run by its Board of Directors, which includes lay members. The Board is supported by committees and officers responsible for its membership and accreditation processes, the UKAHPP's ethical codes and complaints procedures, and the administration of the register. Each committee and function have defined terms of reference.

6.2 The UKAHPP provides information about its structure and governance through the 'About Us' section of its website. This links to its Articles, by-laws and other governing documents, dates of board meetings, and Board of Directors' minutes for the past several years.

6.3 The Accreditation Panel issued the following Recommendation:

- The UKAHPP could improve its transparency and accessibility by displaying information about Board and committee members.
- 6.4 We noted UKAHPP's commitment to Equality, Diversity and Inclusion was reflected on its website, in its Code of Practice and Ethical Procedures, and policies which included its procedures for processing registration applications.
- 6.5 The UKAHPP has an organisational risk register, setting out risks to its operations and sustainability, however this did not appear to be periodically reviewed or updated.
- 6.6 The Accreditation Panel issued the following Condition:
- The UKAHPP must implement tools and processes to assist its identification and mitigation of new risks that could affect its ability to operate the register. The UKAHPP must show how this Condition has been addressed within six months.
- 6.7 The UKAHPP's Organisational Complaints Procedure allows people to raise concerns against it. Such concerns will be considered by an independent adjudication panel which includes an Ethics Committee Panel member, UKAHPP registrants and a lay member. Decisions of the panel will be implemented by the UKAHPP Board of Directors. We noted that this three-stage procedure was similar to those discussed within Standard 5. We found that that the presentation and operation of this procedure should be included when addressing the Conditions issued there.

Standard 7: Management of the risks arising from the activities of registrants

The Accreditation Panel found that Standard Seven was met. It issued the following Condition:

1. The UKAHPP must implement tools and processes to assist its identification and mitigation of new risks to the public occurring within registrants' practice. This must be complete within six months.

Accreditation Panel findings

- 7.1 The UKAHPP's understanding of risks to service users and the public, and mitigating actions against these, was set out within its risk register.
- 7.2 We were not sure if the UKAHPP periodically reviewed or updated the register. Although the UKAHPP advised that it learns from the outcome of complaints, concerns raised and other feedback, we considered that there are further means to inform the UKAHPP's risk management practices.
- 7.3 The Accreditation Panel issued the following Condition:
- The UKAHPP must implement tools and processes to assist its identification and mitigation of new risks to the public occurring within registrants' practice. This must be complete within six months.
- 7.4 We checked if the UKAHPP's website offered clear and accessible information about the limitations and benefits of treatments offered by roles registered. Within Standard One we issued a Condition for the UKAHPP to

provide service users with a clear description of what humanistic psychotherapy is, with reference to a relevant evidence base.

- 7.5 We noted explicit statements that the UKAHPP does not accredit child psychotherapists and will not consider such work within its accreditation requirements, unless the practitioner is a School or Student Counsellor working with a recognised child/family agency or education authority. The UKAHPP's scope of work is defined by the National Occupational Standards and training criteria set out on their website application processes.

Standard 8: Communications and engagement

The Accreditation Panel found that Standard Eight was met. It issued the following Recommendation:

1. The UKAHPP should identify groups who have a clear interest in its policies and processes, including service users, to ensure that there are mechanisms to consult and take account of their feedback.

Accreditation Panel findings

- 8.1 The UKAHPP's website provides information to the public, its registrants and other stakeholders about itself, the role(s) it registers, and about the Accredited Registers programme.
- 8.2 Within previous Standards we considered that areas of the UKAHPP's website should be improved to better communicate the register and its requirements, including its complaints processes. These resulted in the Conditions and Recommendations listed in the relevant Standards.
- 8.3 As noted in Standards One and Two, we required the UKAHPP to take action regarding an out-of-date website that was accessible to the public and contained an out of date register.
- 8.4 The UKAHPP collaborates with other Accredited Registers through the Accredited Registers Collaborative group (ARC) and is part of the Registers' Information Sharing Protocol for distributing and actioning each other's disciplinary outcomes.
- 8.5 We noted that although the UKAHPP invites participation through its website, we were not sure of how the UKAHPP seeks information or feedback, outside of its membership and the ARC.
- 8.6 The Accreditation Panel issued the following Recommendation:
- The UKAHPP should identify groups who have a clear interest in its policies and processes, including service users, to ensure that there are mechanisms to consult and take account of their feedback.
- 8.7 The UKAHPP encourages stakeholders to provide feedback and support its work. The UKAHPP's website invites people to join the organisation and contribute to its committees, supervision, and other groups. The website invites the public to provide feedback on 'how useful therapy has been to an individual, what made a difference; and how therapy has impacted on their

life.’ The UKAHPP told us they remain ‘committed to developing more collaborative links with service user groups’.

Share your experience

- 9.1 We did not receive any responses to the invitation to share experience of the UKAHPP.

Impact assessment (including Equalities impact)

- 10.1 We carried out an [impact assessment](#) as part of our decision to renew accreditation of the UKAHPP. This impact assessment included an equalities impact assessment as part of the consideration of our duty under the Equality Act 2010.
- 10.2 At time of assessment, we had not introduced our new Standard for Accredited Registers: Standard Nine: Equality, Diversity and Inclusion¹⁶. In further assessments we will check how, for example, the UKAHPP acts to ‘understand the diversity of its registrants, service users and complainants and has an awareness of issues that may impact those with protected characteristics as defined by the Equality Act 2010¹⁷’.
- 10.3 The UKAHPP’s Code of Practice and Ethical Principles states that¹⁸ the ‘principles of Equality, Diversity and Inclusion (incorporating Choice) are inherent within the philosophical underpinning of Humanistic Psychology and inform all aspects of UKAHPP decision making’.
- 10.4 We will not accredit any register that allows the practice of conversion therapy by its registrants. Conversion therapy is the term for therapy that assumes certain sexual orientations or gender identities are inferior to others, and seeks to change or suppress them on that basis. We had been concerned that although the UKAHPP made clear to us that its registrants may not practice conversion therapy, it had not signed the Memorandum of Understanding (MoU) on Conversion Therapy in the UK¹⁹ or explicitly stated this in its standards. The UKAHPP has since updated its Code of Practice, however we felt that it did not make explicitly clear that its registrants may not provide conversion therapy. We issued a Condition for the UKAHPP to do so.
- 10.5 We considered that the existence of an out-of-date website providing incorrect information about the UKAHPP’s role and functions may have a negative impact on service users who access it. We required the UKAHPP to address

¹⁶ [Standards for Accredited Registers 2023 \(professionalstandards.org.uk\)](https://www.professionalstandards.org.uk)

¹⁷ Or groups listed under Section 75 of the Northern Ireland Act.

¹⁸ [Code of Practice and Ethical Principles | UKAHPP](#)

¹⁹ <https://www.bacp.co.uk/events-and-resources/ethics-and-standards/mou/>

this with a Condition.

- 10.6 We were concerned about the example of a UKAHPP registrant who appeared to reject potential clients with certain protected characteristics. We issued a condition for the UKAHPP to make clear that statements which appear to discriminate against protected characteristics is unacceptable and may result in disciplinary action should it become aware of registrants doing so.
- 10.7 The UKAHPP expressed its commitment to meeting all such Conditions.