

Annual review of accreditation 2021/22

Association of Christian Counsellors (ACC)

June 2021

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About the Association of Christian Counsellors

The Association of Christian Counsellors (ACC) registers:

- Counsellors
- Psychotherapists

Its work includes:

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

As of March 2021, there were 875 registrants on ACC's register. ACC was first accredited on 26 March 2015. This is its sixth annual review and this report covers 26 May 2020 to 26 May 2021.

Background

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 [Standards for Accredited Registers](#) (the Standards). Accreditation is reviewed every 12 months.

Accreditation can be renewed by a Moderator in cases where all Standards are evidenced to be met. A Moderator can also issue Recommendations.

Where concerns do exist, or information is not clear, a targeted review will be initiated by a Moderator. The outcome of this review is assessed by an Accreditation Panel, who can decide to renew accreditation, renew accreditation with conditions, suspend accreditation or remove accreditation. Panels may also issue Recommendations and note Achievements.

- **Condition** – Changes that must be made within a specified timeframe to maintain accreditation
- **Recommendation** – Actions that would improve practice and benefit the operation of the register, but do not need to be completed for compliance with the Standards to be maintained. Implementation of recommendations will be reviewed at annual renewal

Outcome

Accreditation for ACC was renewed for the period of 26 May 2021 to 26 May 2022.

Accreditation was renewed by a Moderator following a review of evidence gathered by the Accreditation team and supplied by the ACC.

The following Recommendation was issued to be implemented by the submission of annual renewal documentation:

1. The ACC should finalise and publish its revised complaints process making sure that it includes details of its informal resolution processes and that it has been updated to remove reference to the Executive Chair. (See Paragraphs 11.1 to 11.2)

The following report provides detail supporting the outcome.

Assessment against the Standards for Accredited Registers

Standard 1: the organisation holds a voluntary register of people in health and/or social care occupations

- 1.1 There were no significant changes reported or noted in the past year. The Authority found that this Standard continues to be met.

Standard 2: the organisation demonstrates that it is committed to protecting the public and promoting public confidence in the occupation it registers

- 2.1 There were no significant changes reported or noted in the past year. The Authority found that this Standard continues to be met.

Standard 3: risk management

- 3.1 At last year's annual review, the Authority reported on ACC's new risk register. The Authority noted that ACC had made some significant changes including removing and amalgamating some of the risks, which included the removal of risks related to working with children and recovered memories. Previously, the Authority had requested that registers include specific risks associated with working with children and vulnerable people and that counselling registers include risks associated with recovered memories in their risk registers. The Authority considered the risk registers submitted as part of previous annual reviews and found that ACC has an awareness of these risks and that the mitigations previously identified were still in place. However, the Authority was concerned that in expressing risks at a very high level, the ACC risked missing serious individual concerns if these matters were not specifically referred to in the ACC's Risk Register. The Authority decided to issue a Recommendation that the ACC should re-consider the register to ensure that the individual risks identified by the Authority and any others which are likely to cause specific dangers to the public are explicitly set out in the register.
- 3.2 ACC provided an updated risk register as part of this year's annual review. ACC re-introduced risks relating to working with children and vulnerable people and recovered memories. The ACC has also added a new risk on unconscious bias, which covers the risk of potential discrimination in the delivery of counselling services to some groups of people. Mitigations include ACC's involvement in the Diversity and Inclusion collaboration for the counselling profession established by Place2Be and the National Counselling Society, and the development of an internal Diversity and Inclusion forum which will report to the ACC Board (this is also discussed under Standard 7). In 2021, ACC plan to provide CPD training on unconscious bias for all Board Members and Staff and the training will also be offered to ACC counsellors and supervisors and training affiliates. ACC are also planning further training to explicitly look at racism in counselling. The ACC reported that it has looked at issues of difference in relation to race, culture, ethnicity and religious/spiritual expression in its *Accord* magazine which is available to all registrants.

- 3.3 The Authority welcomed the work that ACC has done to mitigate the potential risk of discrimination caused by unconscious bias. The Authority found that the Recommendation had been considered and that this Standard continues to be met.

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

- 4.1 There were no significant changes reported or noted in the past year. As part of its due diligence, the Authority reviewed records from Companies House and the Charity Commission and found that this Standard continues to be met.

Standard 5: the organisation demonstrates that it has the capacity to inspire confidence in its ability to manage the register effectively

- 5.1 At last year's annual review, ACC reported that its updated *Conflict of Interests Policy* was approved by the Board in January 2020. The Authority reviewed the documents and noted that they were written for the Board and Executive Directors and did not appear to apply to members of the Register Advisory Panel (RAP). The Authority reviewed the RAP minutes and found that the RAP did not appear to consider conflicts of interest at its meetings. ACC confirmed that it does not have a separate conflicts of interest policy for the RAP but that they are considered at the RAP meetings, however they are not recorded. The Authority decided to issue a Recommendation that the ACC should consider making it clear that the conflicts of interest policy, or something similar, applied also to the RAP.
- 5.2 At this year's review, the ACC provided its *Conflicts of Interest Policy* for the RAP. This policy covers the identification, recording and management of conflicts of interest. The Authority also reviewed the minutes from the RAP meeting last July and noted that conflicts of interest was asked about and recorded.
- 5.3 The Authority found that the Recommendation had been considered and that this Standard continues to be met.

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

- 6.1 There were no significant changes reported or noted in the past year. The Authority found that this Standard continues to be met.

Standard 7: governance

- 7.1 Previously, the ACC had an Executive Chair. The ACC decided to split this role into separate functions, creating a Chair of the Board and a Chief Executive. Last year, the ACC reported that it was recruiting a Chief Executive. This year, ACC reported that it has appointed the previous Director of Counselling and Psychotherapy to this role. They are currently covering both roles with the support of some temporary part time appointments to cover professional

standards and support, training and marketing and communications. ACC are in the process of recruiting a Head of Member Services who will be responsible for the day-to-day management and administration of the register.

- 7.2 The ACC reported that it has created a Diversity and Inclusion Forum consisting of volunteers from its black and ethnic minority registrants. The purpose of this forum is to advise ACC on diversity and inclusion in relation to race and ethnicity. The forum is called ACC's Ethnic Tapestry (ACCeNT) and representatives report to the Board on a bi-monthly basis.
- 7.3 The Authority found that this Standard continues to be met.

Standard 8: setting standards for registrants

- 8.1 There were no significant changes reported or noted in the past year. The ACC has continued to provide guidance for its registrants throughout the Covid-19 pandemic. The ACC has developed a core competency framework for working with religious and spiritual issues in counselling. The Authority found that this Standard continues to be met.

Standard 9: education and training

- 9.1 There were no significant changes reported or noted in the past year. The ACC confirmed that it has not made any long-term changes to its education and training requirements as a result of the pandemic. The Authority found that this Standard continues to be met.

Standard 10: management of the register

- 10.1 At last year's annual review, the Authority considered ACC's approach to handling non-compliance with its Continuing Professional Development (CPD) requirements. ACC check compliance with its CPD requirements through an annual audit of 10% of its registrants. The audit checks CPD, insurance and supervision. The Authority noted that the ACC had clarified the possible consequences of failing to complete its CPD requirement. The Authority agreed that it was reasonable for the ACC to attempt to assist registrants who for good reason had failed to meet the requirement. However, we considered that it would be appropriate for the ACC to have a written process for its approach which makes it clear at what points registration will be terminated. This would ensure that the register was able to deal consistently and fairly with non-complying registrants while retaining an element of flexibility. The Authority decided to issue a Recommendation that ACC should revise its written process, setting out its approach when handling non-compliance with its CPD requirements to include the process by which a registrant may have their membership withdrawn.
- 10.2 At this year's review, ACC provided its updated CPD policy. The updates included statements reflecting its procedures for handling non-compliance with CPD. The policy sets out that if the outcome of the audit is unsatisfactory the registrant will be provided with written feedback and given a specific period of time to make changes and resubmit their CPD. If the issues remain after this period, ACC will work with the registrant to try to resolve them by for example meeting with one of ACC assessors for advice and guidance. A required

outcome of the resolution process will be an agreement about what action the registrant needs to take to resolve any outstanding issues. Where there is no agreed resolution, or if actions to resolve outstanding actions are not completed within the agreed timeframe, ACC can then remove the registrant from the register. The Authority reviewed the CPD documentation and noted that ACC had clearly set out its process for handling this type of non-compliance and its process for removing a registrant from the register in these circumstances.

- 10.3 The Authority found that the Recommendation had been considered and that this Standard continues to be met.

Standard 11: complaints and concerns handling

- 11.1 ACC reported that it had received eight complaints about registrants in the past year and that six were considered through informal resolution, one was reviewed by the Investigating Committee but not taken to full hearing and one was not taken forward. ACC provided a brief summary of the allegations and outcomes of the complaints received. The Authority did not note any issues.
- 11.2 The Authority reviewed the complaints procedure and noted that it still refers to the Executive Chair, a role which no longer exists. The Authority also noted that informal resolution wasn't referenced in its published procedures. ACC confirmed that complaints will be the responsibility of the Chair.
- 11.3 The ACC confirmed the following as its informal resolution process: 'once a notification of a complaint is received an assessment panel meets to determine the risk to members of the public of the counsellors behaviour / practice standard if the complaint were to be upheld. This risk assessment determines whether ACC will investigate a complaint internally, even where/when the complainant does not pursue a complaint (as in example of the journalist detailed above). The complaint is also assessed as to whether an informal resolution process is appropriate. Where an informal resolution process is deemed appropriate the Chair corresponds with both parties to clarify the allegations and the outcome desired by the complainant, to check that they are a breach of ACC's code of ethics and practice, and invites the registrant to respond to the allegations. Written correspondence, telephone calls and meetings are ways in which information is gathered, analysed and discussed. The Assessment panel regularly reviews progress in each case and will determine what actions the counsellor needs to take to improve their practice in the light of the complaint allegations. The panel also considers any desired outcome stated by the complainant (for example an acknowledgement and apology of hurt caused, a refund of fees an agreement to reflect on their practice standard). At the conclusion of this process ACC writes to each party, with the agreed outcomes of the process. A representative of ACC may also meet with the parties separately to explain the outcomes. If either party are dissatisfied there is an opportunity to move to the more formal and costly option of an independent investigation. The counsellor may be given a set of developmental tasks to complete within a specified timeframe, for example to undertake some training, or to have additional specialised supervision.'
- 11.4 The Authority considered ACC's approach to its informal process and noted that it was important that the registrant and the complainant were aware of the process to be followed and that having a published procedure would be a

significant part of this transparency. The Authority decided to issue a Recommendation: The ACC should finalise and publish its revised complaints process making sure that it includes details of its informal resolution processes and that it has been updated to remove reference to the Executive Chair. (Recommendation 1)

- 11.5 When reviewing the risk matrix, the Authority noted that one of the complaints the ACC had considered related to concerns about conversion therapy. The ACC became aware that several of its members were listed by a third-party organisation and had been contacted by a journalist who was testing ACC's counsellors' adherence to our ethical code which incorporates the Memorandum of Understanding (MOU) on conversion therapy. ACC investigated the concern and found there was no case to answer. ACC also advised the third-party organisation of the inherent risks involved in holding a list of counsellors (for example, how to ensure that all listed have renewed their membership of an accredited register). Following discussions this organisation has decided to stop holding a referral list and will only signpost individuals to Accredited Register holders.
- 11.6 The Authority found that this Standard continues to be met.

Share your experience

- 12.1 The Authority did not receive any responses to the invitation to share experience and did not receive any concerns about ACC during the accreditation year.

Impact assessment

- 13.1 There were no significant changes reported or noted in the past year. The Authority considered the impact of its decision to reaccredit ACC.

Equality duty under the Equality Act 2010

- 14.1 The Authority positively noted the work that the ACC is doing to mitigate against the risks of discrimination arising from unconscious bias. The Authority had regard to its duty under the Equality Act 2010 when considering its decision to reaccredit.