

Annual review of accreditation 2018/19

UK Council for Psychotherapy (UKCP)

November 2018

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About the UK Council for Psychotherapy (UKCP)

The UKCP registers:

- Psychotherapists and Psychoanalytic Counsellors working in the United Kingdom and abroad
- Psychotherapists and Psychoanalytic Counsellors with specific skills, training and experience to work with children and families, on a specialist register

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 September 2018, there were 8,224 registrants on the UKCP's registers.

The UKCP was first accredited on 11 November 2013. This is the UKCP's fifth annual review and this report covers 11 November 2017 to 11 November 2018.

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

Accreditation can be renewed by a Moderator in cases where there are no concerns that a register is not meeting the Standards. A Moderator can issue Recommendations and note Achievements.

Where concerns do exist, or information is not clear, a targeted review will be recommended 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
- **Achievement** – Areas where a register has demonstrated a positive impact on one of the four pillars of the programme; protection, choice, confidence and quality.

Outcome

Accreditation for the UKCP was renewed for the period of 2018-2019.

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

The following Recommendations were issued to be implemented by submission of annual renewal documentation.

1. UKCP should review whether it is necessary for its Board and Chief Executive to have roles in its administrative removal process and whether this provides sufficient separation within UKCP's governance (Paragraphs 7.5-7.7)
2. UKCP should review whether an Interim Suspension Order is necessary to protect clients when it is alerted to another organisation's investigation (Paragraph 11.14)
3. UKCP should develop appropriate guidance to ensure that decisions on whether to act on repeated incidents or similar complaints are consistent and fair (Paragraph 11.16)
4. UKCP should as a priority develop guidance on the appropriate advertising and use of adjunctive practices by its registrants particularly in relation to maintaining professional boundaries¹, whether as part of, or outside, psychotherapeutic settings (Paragraph 11.23)
5. UKCP should consider ensuring that services advertised, such as ADR, are accessible, or otherwise removed from its public websites. (Paragraph 11.30)
6. UKCP should review whether its Code of Ethics and Complaints and Conduct Process (CCP) are sufficiently consistent and if sufficient guidance is available to those wishing to raise concerns (Paragraph 12.3)
7. UKCP should ensure that consistent information is provided to all parties at relevant stages of its complaints processes (Paragraph 12.4).

The following report provides detail supporting the outcome.

¹ For further information see: *Clear Sexual Boundaries* (2008) Available at: <https://www.professionalstandards.org.uk/publications/detail/clear-sexual-boundaries> [Accessed 19 November 2018]

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 have been no significant changes reported or noted in the past year.
- 1.2 The UKCP has seen an increase in the number of registrants on its register in the past year, from 8,050 to 8,224.
- 1.3 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 Following its contact with BUPA, UKCP registered psychotherapeutic counsellors (counsellors who draw from theories and approaches used in psychotherapy) are now recognised by that insurance provider alongside UKCP registered psychotherapists. UKCP advised it continues to seek recognition from other insurance providers.
- 2.2 UKCP is continuing its work with two other Accredited Registers, the British Association for Counselling and Psychotherapy (BACP) and the British Psychoanalytic Council (BPC) to inform the insurance industry about how high standards are maintained within the occupations they register.
- 2.3 UKCP has been working with other organisations 'as part of the Talking Therapies Taskforce (TTTF), whose aim is to create a parallel infrastructure to IAPT for patients with complex mental health needs'.
- 2.4 UKCP is working with the BACP, the British Psychological Society (BPS) and the All-Party Parliamentary Group on Prescribed Drug Dependence in producing a guidance document for therapists working with prescription drug users.
- 2.5 UKCP has been involved in the coalition to raise concerns about draft NICE Guidelines for the treatment and recognition of Depression in Adults. UKCP advised that in response NICE had launched a second consultation, and the coalition was continuing to campaign to ensure that guidelines meet the NHS parity of esteem mandate, which has stated that mental health should be equal to physical health.
- 2.6 The Authority found that this Standard continues to be met.

Standard 3: risk management

- 3.1 UKCP updated its risk matrix to show updates on work done to mitigate risks. The matrix highlighted that work on UKCP's revised Supervision Policy and the review of the Ethical Principles and Code of Professional Conduct were due to be completed in 2019. UKCP had not otherwise amended existing practise risks or scores.

- 3.2 The January 2018 Board of Trustees meeting minutes outline that it was suggested UKCP investigate 'remote / online therapy as a matter of urgency'. UKCP is working with the BACP and BPC to produce joint guidelines for their members. UKCP advised part of this will include investigating potential risks and their mitigations. The team will check for updates on this in due course.
- 3.3 The Authority found 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 have been no significant changes reported or noted in the past year.
- 4.2 UKCP's annual report and financial statements noted an increased expenditure due to its move to new premises and introduction of a new Customer Relationship Management (CRM) system.
- 4.3 As part of its due diligence, the Accreditation team reviewed the most recent accounts from Companies House and the Charity Commission, and noted that UKCP appears to continue to be financially sustainable.
- 4.4 The Authority 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 There have been no significant changes reported or noted in the past year.
- 5.2 The Authority found 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 have been no significant changes reported or noted in the past year.
- 6.2 The team checked UKCP's updated website for how it makes the defined knowledge base, or its development, explicit to the public. At UKCP's initial accreditation, the Panel had noted that UKCP 'makes its knowledge base explicit to the public via clear definitions of therapies, modalities and types of practitioner available on its website. UKCP's Colleges offer detailed descriptions of specific modalities practiced by UKCP registrants. UKCP has a Research Faculty which provides resources, holds events, and 'disseminates research information that enhances practice to UKCP members.'
- 6.3 Definitions of therapies and modalities remain available through the 'Common types of psychotherapy' webpage. UKCP's website provides links to each of its Colleges and describes each College's individual philosophy.
- 6.4 The team noted that UKCP's 'Research section' was marked as 'coming soon' and asked the UKCP about planned development of this section. UKCP responded that it has recently appointed eight new members to the

Research Faculty Committee and intends for the Research section of the website to be functioning in early 2019.

6.5 The Authority found that this Standard continues to be met.

Standard 7: governance

- 7.1 UKCP has amended its byelaws to 'allow all eligible organisational members to sponsor people for UKCP trainee and student membership'.
- 7.2 UKCP has conducted a College Review, which has resulted in recommendations for change discussed by its Board in September 2018. The outcomes of the review have not yet been shared as some recommendations will require wider consultation before they are implemented. The team will check on this in due course.
- 7.3 UKCP highlighted its communications work to promote psychotherapy and UKCP therapists. It has partnered with *Psychologies* magazine; relaunched its own *Psychotherapist* magazine as the *New Psychotherapist*; created short videos aimed at its membership and the public; and launched its *Talking Therapies* podcast which has covered topics such as achieving workplace wellness, bullying at work and sex addiction. UKCP has received coverage in *Times Higher Education*, *Huffington Post* and the *Metro*.
- 7.4 UKCP noted changes of Board Trustees throughout the year and advised that its two longest serving trustees will be required to stand down in December 2018 and so elections for one UKCP Vice Chair and one Trustee were held in September 2018.
- 7.5 The team noted discussion in UKCP's Board minutes around the Board's role in removing registrants who do not, for example, engage with UKCP's mandatory reaccreditation process or random annual audit. The team checked UKCP's removal process and noted that recommendations to remove non-compliant registrants will be made to the Membership Committee by UKCP's registrar. The Membership Committee will check whether UKCP's processes have been followed correctly and allow the removal or if not, refer to UKCP's Board and Chief Executive. The Board and Chief Executive will consider the information and decide whether the registrant should be removed.
- 7.6 The team noted that precedent decisions by the Accreditation Panel stated that it is not appropriate for organisations' Boards to ratify (other than to ensure process has been followed) or otherwise affect the outcomes of complaints processes. UKCP stated that the above procedure is not a complaints process; it is administrative removal of registrants who fail to meet UKCP's registration requirements.
- 7.7 The Moderator considered whether the Board's involvement within such processes demonstrates sufficient separation of its public protection functions. The Moderator noted that as a professional body membership organisation there could be a perceived conflict of interest. The Moderator issued a Recommendation for UKCP to consider whether it is necessary for the Board and Chief Executive to have roles in that process and if there is sufficient separation within UKCP's governance (Recommendation 1).

- 7.8 There is a link to UKCP's register on the main page of its [website](#) which allows the public to identify whether a particular therapist is registered with UKCP. The team noted that the front-page and the 'site map' links to the register, but it may not otherwise be easily accessible from other parts of the site. The team suggested UKCP may wish to provide further links, for example from its Find-a-therapist page, as not all registrants may be accessible from that service. UKCP stated that it agreed with this and advised it would make necessary amendments. The team will check on this in due course.
- 7.9 In the past year of accreditation, UKCP has held a Minding the Gap in Child Mental Health conference and its annual Learning from Complaints event. UKCP plans to hold workshops on research, supervision and safeguarding in the next year.
- 7.10 The Authority found that this Standard continues to be met.

Standard 8: setting standards for registrants

- 8.1 There have been no significant changes reported or noted in the past year.
- 8.2 UKCP has been revising its *Ethical Principles and Code of Professional Conduct*. UKCP advised a second consultation, ending September 2018, had been held on its most recent draft. This draft was checked by the team.
- 8.3 The team noted that the revised code should allow UKCP to investigate allegations about registrants that involve matters outside of registrants' psychotherapeutic treatment of clients. This was discussed further under Standard 11.
- 8.4 The Authority found that this Standard continues to be met.

Standard 9: education and training

- 9.1 There have been no significant changes reported or noted in the past year.
- 9.2 The team checked that UKCP's updated website continues to make UKCP's education and training standards accessible to the public (Standard 9e). The 'Standards, guidance and policies' webpage states: 'The training for psychotherapists is postgraduate masters, or masters-equivalent level specialist training. It is not normally less than four years. The training for psychotherapeutic counsellors is degree level or equivalent.'
- 9.3 UKCP's full *Standards of Education and Training (The Minimum Core Criteria)* and other standards for registration remain available for download from the register website.
- 9.4 UKCP advised it is working 'jointly with BACP and BPC on a collaborative project, led by an impartial, independent chair, to set out the training requirements and practice standards for counselling and psychotherapy.' UKCP advised that its initial mapping of competences between each organisation had been completed and results were being worked with by an expert reference group.
- 9.5 The Authority found that this Standard continues to be met.

Standard 10: management of the register

- 10.1 The team conducted checks of UKCP's register and Find-a-therapist tool as part of its assessment and did not note any issues regarding their maintenance.
- 10.2 UKCP has submitted a Notification of Change for members of its 'specialist' Children and Young People register to allow practitioners to use the titles of Child Psychotherapist, Child Psychotherapeutic Counsellor and Family and Systemic Psychotherapist. At time of annual review this was being assessed under that separate process.
- 10.3 UKCP performs an annual audit of a sample of registrants to ensure its Continuing Professional Development (CPD) and other requirements continue to be met. UKCP advised that two registrants selected for CPD audit resigned and that six were removed from the register for failing to submit the required documentation.
- 10.4 The Authority found that this Standard continues to be met.

Standard 11: complaints and concerns handling

- 11.1 UKCP advised that over the past year of accreditation it had received 56 complaints, 35 of which have been taken forward. Of the 56 complaints received since September 2017, two had been formally referred to an Adjudication Panel. UKCP currently has 32 live cases, the majority of which were received during 2018. UKCP advised that several of these were waiting on the outcome of either employer disciplinary procedures or police investigations. UKCP advised that since the previous annual review of accreditation it had held one Adjudication Panel hearing, in October 2018.
- 11.2 UKCP stated that it expects to receive a record number of complaints in 2018 and suggested that the high level of complaints received reflected increased public awareness of the register. UKCP will undertake a review to understand this trend.
- 11.3 UKCP received four complaints against itself in the past year. Two regarded UKCP's handling of complaints regarding registrants' behaviour outside of the psychotherapeutic environment. UKCP had advised complainants that these were outside of its remit. Those complainants had then approached the Accreditation team to raise their concerns about this.
- 11.4 To gather further information on the concerns received by the Accreditation team through the Share your experience process, the team conducted a site visit at UKCP's offices on October 2018. The team reviewed two cases where complaints had been investigated, however the complainants were dissatisfied by UKCP's findings. The team also checked UKCP's recent cases that were closed due to having been found to be outside of UKCP's remit because the allegations involved events that were outside of the psychotherapeutic environment.
- 11.5 UKCP considers complaints that are determined to be within the scope of UKCP's Ethical Principles and Code of Professional Conduct. As the Code currently in place strictly refers to the practitioner/client relationship, complaints that fall outside of events occurring within that relationship

would not progress under UKCP's Complaints and Conduct Process (CCP).

- 11.6 During its site visit, the team noted two instances where safeguarding issues were explicitly raised and UKCP was notified of referrals to relevant authorities. Some complainants were surprised that UKCP could not investigate where registrants' behaviour may have undermined the reputation of psychotherapy and damaged public confidence in the profession. However, as the allegations did not involve events occurring in psychotherapy, UKCP considered that it could not act on such concerns and relayed this to complainants.
- 11.7 The team considered it may be appropriate to investigate allegations of potential misconduct or professional incompetence that occur outside the provision of psychotherapy, where it is in the public interest. If not investigated, the team considered these might have potential, for example, to cause harm to clients or to undermine confidence in UKCP and the occupation it registers.
- 11.8 The team asked if UKCP was able to investigate complaints of behaviours outside of therapy that could impact on the therapist's ability to practise ethically. UKCP confirmed that it could investigate 'criminal convictions/cautions which [are] relevant to [a] therapist's professional practice; physical or mental health relevant to a therapist's professional practice; or a decision by another body responsible for the regulation of a health, social care or other relevant profession; or an employer to the effect that a therapist's suitability to be on the UKCP register is called into question'.
- 11.9 The team noted that UKCP's Board of Trustees had in the past year discussed how to handle such concerns and that this issue was now being considered by its Ethics Committee. UKCP also highlighted that the current draft of its revised Ethical Principles and Code of Professional Conduct (the Code of Ethics) has the new provision: to 'act in all circumstances in a way which upholds the profession's reputation and promotes public confidence in the profession and its members'.
- 11.10 The team asked UKCP when it aimed to implement its new Code of Ethics. UKCP advised that, pending the final revision of the draft and decisions of its Executive Committee and Board of Trustees, the Code was due to be ratified in February 2019, with a launch event to be held in May 2019.
- 11.11 The Moderator was concerned that it could be perceived that UKCP did not investigate complaints involving serious conduct issues which were likely to have a bearing on individuals' fitness for registration. The Moderator noted that UKCP was working to address this however stated this work should be completed as soon as possible to allow UKCP to accept complaints occurring outside the psychotherapeutic environment. The Moderator requested that UKCP provide a copy of the final Code of Ethics to the team once ratified.
- 11.12 UKCP's CCP allows it to impose Interim Suspension Orders 'at any stage of the Complaints and Conduct Process after a written complaint has been received by UKCP'. The cases reviewed by the team suggested that UKCP

had been made aware of open investigations by other relevant authorities but did not act as criminal convictions or other outcomes had not yet been issued.

11.13 The Moderator considered that UKCP registrants remain in practice while the UKCP is aware of serious allegations made against them. The Moderator issued a Recommendation for UKCP to consider whether an Interim Suspension Order is necessary to protect clients when it is alerted to another organisation's investigation, rather than only being able to do so once the outcome is known. Informing the complainant of UKCP's consideration of an interim order could help promote confidence in the effectiveness of the register. (Recommendation 2)

11.14 The team noted a complaint against a registrant who had previously declared being investigated for a complaint of a similar nature. UKCP's communication with the complainant stated that the new complaint would be kept on file and taken into account for any future complaints. The team asked UKCP for its process on taking repeated similar complaints into account where these would not lead to formal investigation on their own. UKCP responded:

'If we received a number of similar complaints that point to a pattern we can take them all into account and bring the matter before the Adjudication Panel as that would demonstrate that despite previous feedback the therapist has not really taken them on board. We can carry out a targeted audit of a registrant if we have concerns about their practice.'

11.15 The Moderator issued a Recommendation for UKCP to consider ensuring that it has appropriate guidance to ensure that decisions on whether to act on repeated incidents or similar complaints are consistent and fair. (Recommendation 3)

11.16 Through its review of complaints, the issue of adjunctive therapies that may or may not be part of psychotherapeutic practice was raised. One such area of practice is sexual healing therapy, which involves using sexual activity to resolve various problems, which are not necessarily sexual issues. UKCP confirmed that it does not consider sexual healing therapy to be within the practice of psychotherapy, and that it is wholly different to sexual therapy, which aims to solve sexual problems through counselling or psychotherapy. UKCP emphasised that, under its Code of Ethics, therapists must not have sexual contact with clients.

11.17 The team asked UKCP if it has guidance on what may, or may not, be considered to be psychotherapeutic practices within its remit. The team asked if there might be a risk that, in lieu of evidence such as detailed contracts, a registrant may deny that harm was caused within their therapeutic sessions but within a therapy outside of UKCP's remit. UKCP responded:

'Each matter would be dealt on a case by case basis and if a complainant expected psychotherapy and were enticed by a therapy using their UKCP credentials or psychotherapy training and proceeded

to give something other than psychotherapy we would take that case forward.'

- 11.18 UKCP confirmed that registrants would not be permitted to refer to UKCP in advertising for practices outside of those covered by UKCP. UKCP would take action to ensure a registrant removed such advertising. UKCP also confirmed that it could investigate concerns raised where a non-psychotherapeutic practice, for example acupuncture, was used during an agreed psychotherapy session, as a dual relationship.
- 11.19 The team noted that the amendments to UKCP's Code of Ethics, as described above, should allow UKCP to investigate concerns raised about adjunctive practices.
- 11.20 The Moderator noted the boundary between 'sexual healing' practices based in psychotherapy and psychotherapeutic talking therapies was blurred. Such practices involve high levels of vulnerability and risk of breaching sexual boundaries. The Moderator considered that where UKCP is aware registrants are practicing adjunctive therapies such as sexual healing, the register should consider what risks they may pose to the public, what controls may be needed to protect the public, and whether the practices are compatible with registration.
- 11.21 The Moderator issued a Recommendation for UKCP to urgently develop guidance on the appropriate advertising and use of adjunctive practices by its registrants, whether as part of, or outside of, psychotherapeutic settings. (Recommendation 4)
- 11.22 The team had noted that UKCP did not investigate concerns raised against registrants acting as supervisors of other practitioners. The team noted UKCP had set up a working group to consider it should investigate such complaints. UKCP sets education, training, and practice standards for supervisors who are on its Supervision Directory. The team will check progress on this work over the following year.
- 11.23 UKCP provided information on its joint protocol with BPC and BACP, addressing how the organisations will manage concerns raised where a practitioner may belong to more than one of those registers. UKCP confirmed it is notifying the BACP and BPC of its Adjudication Panel decisions resulting in a sanction, as well as interim suspension order decisions. UKCP has also signed the Accredited Registers Collaborative information sharing protocol.
- 11.24 Standard 11b requires Accredited Registers to encourage early resolution of complaints, including the use of mediation where appropriate. UKCP advised that in 2017 its Board approved a proposal to introduce an Alternative Dispute Resolution (ADR) service. We reported last year that UKCP was planning on launching its ADR process in autumn 2017.
- 11.25 During its site visit, the team noted that a recent complaint had requested ADR instead of a formal disciplinary procedure, but the complainant was informed by UKCP that this process was not currently in place.
- 11.26 The team asked UKCP for an update on its ADR service including timelines for operation. UKCP responded: 'We held a training session in April 2018

for potential facilitators and we collated their feedback in how they envisage the finer details of the ADR process should look like. We aim to have a more fine-tuned process by spring 2019 and fully operational by summer 2019.'

- 11.27 The team asked if any informal arrangements for ADR were in place, prior to launch of its developing process. UKCP responded that it only aims to send the most serious cases to hearing, and for less serious cases explores other ways to resolve complaints. This includes encouraging complainants to resolve concerns directly with the therapist, receiving desired outcomes at the investigation stage where the complainant may receive an apology and see insight by the registrant, and by UKCP providing feedback to registrants where issues are identified but do not progress to formal hearings.
- 11.28 The Moderator noted that UKCP's formal ADR procedures have been in development for considerable time and emphasised that if UKCP advertised ADR as a service on its website it should allow the public to make use of it. If the service was not 'live' then it should not be advertised. The Moderator issued a Recommendation for UKCP to consider ensuring that services advertised, such as ADR, are accessible, or otherwise removed from its public websites. (Recommendation 5)
- 11.29 At the previous annual review, the team had checked UKCP's draft *Indicative Sanctions Guidance*. UKCP provided the team with the final version, published in January 2018. The guidance 'aims to promote consistency and transparency in decision making. It ensures that all parties, including the Registrant, the witnesses and the public, are aware of the approach taken by a panel when considering the question of sanction, and provides a panel with UKCP's authoritative approach to sanction for reference.'
- 11.30 The team noted that the guidance's section on 'Termination of Registration with UKCP' within the Guidance states that relevant employers will be informed, and the relevant College and/or organisational member (OM) will be expected to remove their association with the member. UKCP confirmed that the College/OM will be notified of other sanctions, and noted that for some sanctions support may need to be provided to the member by the College/OM.
- 11.31 The team had asked UKCP to provide further information about its 'root cause analyses' carried out at the end of complaints investigations, and how issues identified are escalated and acted upon. UKCP advised that where gaps of training or knowledge are identified these are published in the PCC annual report. Themes identified are also addressed at UKCP's annual learning events. The PCC has a representative from the Ethics Committee who will report any training needs or areas of concern, and issues identified are disseminated to registrants through monthly bulletins.
- 11.32 The Authority found that this Standard continues to be met.

Share your experience

- 12.1 The Accreditation team did not receive any responses to the Share Your Experience process.
- 12.2 The team assessed five concerns about the UKCP within the previous year of accreditation. The majority of issues raised through these concerns are highlighted earlier in the report. Further to these issues, the following points in paragraphs 12.3 and 12.4 were raised.
- 12.3 In one case reviewed, the team noted that UKCP's CCP highlighted registrants' overriding 'duty of confidentiality' whereas its Code of Ethics referred to undefined 'limits to confidentiality'. The complainant could have formed their complaint from the terms of the latter policy and reasonably expected the UKCP to act in line with this. The Moderator expressed concern that the perceived conflict between policies may prevent UKCP from investigating serious concerns against registrants. The Moderator issued a Recommendation for UKCP review whether its Code of Ethics and Complaints and Conduct Process (CCP) are sufficiently consistent and if sufficient guidance is available to assist those wishing to raise concerns. (Recommendation 6)
- 12.4 In another case, the team noted a disparity of information provided to the complainant and registrant. The complainant was not advised that the registrant had been given recommendations on improving their practice in light of the complaint. The Moderator noted that different information had been provided to the parties to complaints and issued a Recommendation for UKCP to consider how it can ensure consistent information is provided to all parties at relevant stages of its complaints processes. (Recommendation 7)

Impact assessment

- 13.1 There have been no significant changes reported or noted in the past year.

Equality duty under the Equality Act 2010

- 14.1 The Authority had regard to its duty under the Equality Act 2010 when considering the application for renewal of accreditation.