

# Annual review of accreditation 2020/21

British Psychoanalytic Council (BPC)

February 2021

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## About British Psychoanalytic Council

The British Psychoanalytic Council (BPC) registers:

- Psychoanalytic Psychotherapists
- Psychodynamic 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 October 2020, there were 1690 registrants on BPC's register.

BPC was first accredited on 20 November 2014. This is its sixth annual review and this report covers 20 November 2020 to 20 November 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 demanding [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 issue Recommendations and note Achievements.

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
- **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 BPC was renewed with conditions for the period of 20 November 2020 to 20 November 2021.

Accreditation was renewed by a Panel following a review of evidence gathered by the Accreditation team and supplied by BPC. The Moderator requested that a targeted review be carried out on Standards 10 and 11 and noted that this may impact on Standards 2 and 5. The Moderator found that all other Standards were met.

The following Conditions were issued to be implemented by the timeframe specified:

1. BPC should ensure that the homepage of its website provides information about its regulatory and complaints handling role, with appropriate links, directed at members of the public. This should be completed by the submission of the next annual review paperwork. (See paragraphs 11.1 to 11.4)
2. BPC should provide a report to the Authority on the number of cases taken through the Practice Review Proceedings (PRP) and hearing route since the procedure was implemented. The report should include information on the allegations and the outcomes. This is to be completed within three months. (See paragraphs 11.5 to 11.20).
3. The BPC should:
  - a) Review its procedure and associated guidance documents and provide a report to the Authority within six months. The review should include the criteria for deciding the route the complaint should take, the purpose of the different routes, the sanctions available for both routes and how and whether these are published, the purpose of interim orders and the way in which cases are presented and should address the Panel's concerns.
  - b) Provide the Authority within six months an implementation plan for any changes made as a result of the review. (See paragraphs 11.5 to 11.20)

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

1. BPC should consider options to improve its openness and transparency by, for example, publishing Board meeting minutes and dates of meetings on its website. These could be the minutes of public sessions or excerpts of meetings where topics discussed are relevant to the public interest (See paragraphs 5.2 to 5.5)
2. BPC should develop guidelines for its registrants about whistleblowing and the professional duty of candour (See paragraphs 8.2 to 8.4)

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 The Authority noted BPC's diversity webpage. This page contains the BPC Diversity and equalities statement and the BPC Position Statement on Homosexuality. The page also contains bibliographies compiled by BPC on sexual orientations and race, racism and ethnicity which can be used as a resource by practitioners.
- 2.2 BPC also has a dedicated page to [safeguarding](#) which highlights BPC's safeguarding policy and notes that BPC is 'committed to safeguarding and promoting the welfare of children and vulnerable adults.'
- 2.3 The Authority considered whether the Condition under Standard 11 would impact on this Standard, however decided that it did not at this time suggest that the BPC was not committed to protecting the public and therefore found that this Standard continues to be met.

## Standard 3: risk management

- 3.1 At last year's annual review, the Authority considered BPC's approach to adjunctive therapies; these are practices performed by registrants during their work that are outside the explicit scope of their practise or competence. These practices may be directly related to the register's modalities (for example a counsellor practising hypnotherapy) or completely unrelated (for example a counsellor practising complementary therapy). BPC noted that this had not been an issue that had previously arisen except where registrants were also regulated and therefore it did not see it as a significant risk. BPC did confirm that if it did receive a complaint that related to an adjunctive therapy and the registrant was not dual registered it would review the complaint in relation to its *Code of Ethics*. The Authority issued a Recommendation that the BPC should consider adding adjunctive therapies as a specific risk to its risk matrix.
- 3.2 The Authority has also asked that all Accredited Registers review and update their risk registers, to assess how the coronavirus emergency will impact them and their registrants, and what actions can be taken to mitigate these risks.
- 3.3 BPC has updated its risk matrix to include adjunctive therapies. BPC's states in its description that 'there is a risk that our registrants might also be trained in another practice and would offer this alongside the psychoanalytic psychotherapy. These adjunctive therapies would therefore not be able to be regulated by the BPC. We believe this risk is low.' Under mitigations BPC note that registrants 'would not be expected to offer an adjunctive therapy without

discussion with senior colleagues or their supervisor. In general, changes or extensions to the central treatment model would not be considered appropriate or ethical and if other treatments were required then it would be usual to refer the patient onto another practitioner expert in that methodology. In all cases, registrants are required to work within their competence.'

- 3.4 BPC has also incorporated risks associated with Covid-19 into both its practice risk matrix and its business risk matrix. BPC reported that it provides regular briefings to its registrants on practice during Covid-19 which can be found on its [website](#). The Authority has reviewed the briefings and did not find any concerns with BPC's approach.
- 3.5 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 information provided by the BPC and noted 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 were no significant changes reported or noted in the past year.
- 5.2 In 2018, the Authority considered openness and transparency and noted that BPC did not publish minutes of its Council meetings on the website. BPC reported that 'following the adoption of new Articles of Association, it is considering publishing Council minutes.' The Authority decided to issue a Recommendation for BPC to publish minutes of its Board and Council meetings on its website.
- 5.3 At last year's annual review, BPC noted that it planned to publish the Council minutes once it had achieved charitable status. The Authority highlighted that the above Recommendation was issued to increase the openness and transparency of the running of the register. BPC reported that it intended to publish minutes from its Council meetings from January 2020. The Authority noted BPC's commitment to publishing the minutes and so decided not to re-issue the Recommendation.
- 5.4 The Authority asked for an update on this during the current review. BPC reported that 'having considered the publication of Council Minutes the BPC have decided that we will not be publishing Council minutes. The information within the Council Minutes does not need to be in the public domain.'
- 5.5 The Authority noted that BPC has a Board and a Council as noted on its [website](#). It would appear that there may have been a misunderstanding last year. In 2018 the Authority set a Recommendation for the BPC to publish minutes of its Board and Council meetings. The aim of this Recommendation

is to increase the openness and transparency of the running of the register. At last year's annual review, BPC indicated that it would publish its Council minutes, therefore the Recommendation was considered as met. This year BPC has stated that it will not publish Council minutes as matters discussed are private. The Authority suggested that the Recommendation should have been aimed at the Board who is responsible for running the register and decided to issue the following Recommendation: BPC should consider options to improve its openness and transparency by, for example, publishing Board meeting minutes and dates of meetings on its website. These could be the minutes of public sessions or excerpts of meetings where topics discussed are relevant to the public interest. (Recommendation 1)

- 5.6 The Authority considered whether the Condition under Standard 11 would impact on this Standard however decided that it did not impact on the BPC's capacity to inspire confidence at this time and therefore 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 The BPC has a page dedicated to its [knowledge base](#) on its new website. This page provides a summary of key findings and external links to some of the research. The BPC has also provided downloadable documents produced by the BPC such as '*Psychoanalytic psychotherapy: what's the evidence?*' '*Will psychodynamic psychotherapy work for my patient?*' and '*Where and how to find research.*'
- 6.2 The Authority found that this Standard continues to be met.

**Standard 7: governance**

- 7.1 As reported last year, the BPC successfully became a charity and so is now accountable to the Charity Commission regarding its activities in England and Wales, and the Office of the Scottish Charities Regulator in Scotland. BPC's Board 'believes this increased scrutiny and transparency will further aid our regulatory functions and increase public confidence in our Register.'
- 7.2 BPC reported some significant changes to its governance over the past year with the stepping down of its CEO and Head of Regulation (Legal Advisor). BPC has recruited an interim CEO while it works with a recruitment agency to find a permanent CEO. BPC estimate this process will take approximately six months. BPC has recruited a new Head of Regulation who will be starting in January 2021, and BPC reported that it has recruited someone to cover the post in the interim.
- 7.3 In addition to a new CEO, BPC has appointed three new Board members, all of whom are psychotherapists. In total the BPC Board consists of 10 members, two of which are lay.
- 7.4 BPC noted that it has strengthened its governance structures and updated its Articles of Association. These were reported on as part of last year's annual review.

- 7.5 BPC reported that it has developed a new website. The Authority reviewed the new [website](#) and noted that the website was easy to navigate. The *Find a therapist* tool, which acts as the BPC's register can be accessed from the homepage as well as through the 'About Psychotherapy page.' The register is discussed under Standard 10. BPC provides information about [registration](#) including details of the different registration grades. BPC provides information about [training](#), this includes details of its training providers, how it accredits training and the Scope of Practice and Education (SCoPEd) project. Information about complaints is found on under 'regulation' and is discussed further under Standard 11.
- 7.6 During its initial review of the new website, the team noted that BPC had not used the Accredited Registers Quality Mark. In the annual review form BPC reported that it had added the mark to the '[about us](#)' page, however the team couldn't see it on any other pages.
- 7.7 The Authority found that this Standard continues to be met.

### Standard 8: setting standards for registrants

- 8.1 At last year's annual review, the Authority considered the BPC's approach to the professional Duty of Candour and Whistleblowing. The Authority noted that BPC's *Code of Ethics* contained references to the professional Duty of Candour. However, BPC stated that it intended to include both in an updated version.
- 8.2 This year, BPC reported that its review of the *Code of Ethics* is almost complete but has been slightly delayed by the pandemic. BPC noted that it has concluded that generally its codes are sufficient but that certain areas need to be updated. BPC reported that it had not 'referred to the duty of candour specifically, but we have tried to capture the general essence of the duty of candour and whistleblowing. This includes Registrants being open with their Clients and willing to discuss any risks openly and managing expectations. When things do go wrong making sure that Clients or any third party are informed promptly. Limiting any harm whether the Client is aware of it or not and taking steps to repair any damage that has occurred. A great deal of the duty of candour and whistleblowing arises in the Registrant's relationship with their Supervisor. Supervision is a way for Registrants to constantly review their own work and behaviour and provide an avenue to assess practice and be accountable for their practice.'
- 8.3 BPC reported that its Ethics Code working party is looking at guidance around whistleblowing, as part of the revision of the *Code of Ethics* which it hopes to complete by the summer of 2021. BPC noted that it has drafted revisions around confidentiality, records and remote working which are currently being consulted on with its Member Institutions. Other possible areas for expansion include accountability and candour, whistleblowing/requirement to challenge colleagues, relationships with clients/patients post-discharge, specific issues in regard to work with children. These are being discussed by the Working Party. BPC highlighted that it has a whistle blowing policy for its staff. The Authority decided to issue a Recommendation: BPC should develop guidelines for its registrants about whistleblowing and the professional duty of candour. (Recommendation 2)



8.4 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 Authority found that this Standard continues to be met.

#### **Standard 10: management of the register**

10.1 During last year's annual review, the Authority noted that BPC asked registrants to make disclosures of criminal offences, disciplinary outcomes, suspension, or removal from any professional regulatory body in the last 12 months. BPC reported that it was reviewing the wording of this as it recognises that there is a potential risk to the public in limiting the timeframe to 12 months. BPC reported this year that it has reviewed and updated its registration form to include the following requirements:

- a) Declaring unspent criminal records
- b) Confirmation that a registrant has not been dismissed from employment for any reason or refused/removed from membership of a professional body/register on any grounds.
- c) Declaring any pending criminal, civil, financial difficulties or disciplinary actions, investigations, proceedings.

BPC has also updated its registrant annual renewal form and removed the 12-month time period from the declarations.

10.2 At last year's annual review, we noted some inaccuracies in the information on the register. This was the subject of a targeted review, at the time BPC noted that the errors had been caused by a technical glitch which it estimated would be corrected by January 2020. BPC told us that it would be carrying out monthly checks on its register for six months or until it was satisfied that the errors had been fixed and would then check 5% of its register every three months going forward.

10.3 BPC provided an update at this annual review. BPC noted that the glitch was fixed at the time of the last targeted review and that it has put a mechanism in place to check the register. With the launch of its new website, BPC allowed registrants to update their own profile, including name, contact and practice details. BPC confirmed that registrant cannot change the registration number or details of any sanctions. BPC also confirmed that it did not have any mechanisms in place to ensure the accuracy of this information.

10.4 The Moderator considered the information provided by the BPC and noted that it is important for an Accredited Register to maintain control and ensure that it has an accurate register. It was not clear to the Moderator what checks the BPC was doing to ensure the accuracy of its register. In addition to having mechanisms in place to ensure the register is accurate and allows those using it to make informed decisions, allowing registrants to change their name without further checks raises risks including the potential for a registrant to have a different name on the register to that in a published sanction. The Moderator requested that a targeted review of this standard be done.

- 10.5 BPC confirmed that registrants are required to ensure and confirm that their details are up to date at annual renewal. The registrant's details are also confirmed with their Membership Institutions (MIs). The MIs are contracted to assist the BPC in maintaining the accuracy of its register and any significant changes requested by a registrant in the year must be confirmed with the MI. BPC reported that it continues to monitor its register throughout the year and that it reminds its registrants regularly to check their information. BPC has reviewed its policy on allowing registrants to update their entries. BPC has decided to restrict what information their registrants can update to their contact details, their availability for supervision, details of their experience and professional interests.
- 10.6 The Authority reviewed the online register and did not note any inaccuracies in the information presented. However, the team were not clear how sanctions would be recorded on the register. This is discussed more under Standard 11.
- 10.7 The Panel reviewed the information supplied by the BPC and found that this Standard continues to be met.

### Standard 11: complaints and concerns handling

- 11.1 The Moderator reviewed the information provided by BPC and requested that a targeted review of this standard be carried out to consider the accessibility of the information to the public, the publication of sanctions, and the use of the Practice Review Procedure.
- 11.2 Standard 11(a) requires a register to provide clear information about its arrangements for handling complaints and concerns about its registrants and itself. As noted under Standard 7, BPC has updated its website. Information about how BPC handles complaints against registrants can be found under the 'regulation' section of its [website](#). The Authority noted that a service user who wished to make a complaint may not know to look under the 'regulation' tab to find the process.
- 11.3 BPC confirmed that its new website was tested by several members of its Board and that it has made changes following feedback from registrants and the public. BPC also highlighted its search bar, noting that if using 'complaint,' 'the first result will direct the user to how to make a complaint about BPC, and the second result directs the user to the page which details '*How to make a complaint about a Registrant.*'
- 11.4 Part of this Standard requires information about complaints handling to be easily accessible so as not to pose a potential barrier to those who wish to complain. The Panel reviewed the information provided by the BPC and the website. The Panel noted that complaints handling is a core function of an Accredited Register and that it should be easy for the public to find out how to make a complaint. The Panel considered the website and felt that it should be clearer on the homepage that the BPC is responsible for setting standards and considering complaints against its registrants. The Authority decided to issue a Condition: BPC should ensure that the homepage of its website provides information about its regulatory and complaints handling role, with appropriate links, directed at members of the public. (Condition 1)

- 11.5 Following the targeted review, BPC updated its website to include information about its [organisational complaints policy](#).
- 11.6 BPC has received six complaints against registrants in the past year, four of which have progressed to full hearing and two of which progressed to Practice Review. BPC reported that it had to cancel hearings that were listed due to the lockdown. BPC stated that it assessed each case in terms of risk before making the decision to postpone the hearings. BPC is now looking at how it can take these forward either by holding remote hearings or physical ones. BPC noted that it 'did research remote hearings but due to us having such a small staff team and limited resources we felt the security risk involved in holding remote hearings without the expertise and software packages was too much to the organisation. However, we note that remote hearings are being considered by other regulators and we are looking into whether this is a viable option for the BPC.'
- 11.7 We received one concern during the accreditation year from an individual whose complaint about a registrant was handled through the PRP. The complainant had received therapy from the registrant as a compulsory part of the training they were undergoing. The training was approved by the BPC. The complainant was concerned about a lack of transparency as BPC does not publish the outcomes of the PRP. The complainant felt that there was a risk the training course that offered the list of therapists for the complainant to choose from was left unaware of the outcome of the complaint. The complainant also raised concerns about BPC's communications noting that they had felt compelled to agree to the PRP route as they felt they would not be supported by BPC if not. There were also concerns about the requirement to keep the matter confidential as it was felt this could prevent people from getting the support they need.
- 11.8 The Authority reviewed the Complaints Procedure in relation to the PRP. Briefly, when a complaint arrives at BPC it is reviewed by the Fitness to Practice Officer (FtPO) to ensure it meets its requirements before being sent to the Screening Committee (SC) along with the details of any previous letters of advice or formal warnings. The FtPO will inform the complainant and the registrant that the complaint has been sent to the SC, providing a copy of the papers that went to the SC and information about the Practice Review Procedure and the Hearing Panel Procedure. Either party can request that the PRP be followed. If this happens the FtPO will seek agreement from the other party. This information will be provided to the SC which will decide if the complaint should be dismissed or which track the complaint should take. The SC can also request further information from either party. The SC will refer the matter to the Practice Review procedure if it considers it to be in the public interest to do so.
- 11.9 If the SC decides that the PRP should be followed the FtPO initiates the procedure by requesting letters of agreement from both parties. If either party does not agree, the case is reconsidered by the SC. The PRP panel consists of three people, at least one lay member and one professional member. The panel may reach a decision either based on the papers or at a meeting with both the registrant and the complainant present. There are three possible outcomes to the PRP:

- a) To dismiss the complaint
  - b) Give a letter of advice to the registrant
  - c) Give a formal written warning to the registrant.
- 11.10 The Authority noted that the PRP panel can issue interim orders and asked if this did occur, whether the case would be escalated to the Hearing panel. BPC noted that 'a complaint will not automatically be referred to a Hearing Panel if a Practice Review Panel (PRP) issues an Interim Order. However, in accordance with paragraph 4.11 of the Complaints Procedure (CP), the PRP may, in consideration of the papers or if new evidence comes to light, refer the complaint back to the Screening Committee.'
- 11.11 The outcomes of the PRP (warnings and letters of advice) are not published. BPC shares the outcome with the Complainant and the Registrant who both have the right to appeal the decision. BPC will also share the outcome (but not the report) with the BPC Ethics Chair and the registrant's Member Institution Ethics Chair. Warnings and Letters of Advice are kept on the registrant's file and are taken into account if further complaints are received. BPC reported that it is currently getting advice about how long a warning or a letter of advice is kept on the registrant's file.
- 11.12 BPC noted that 'cases referred for Practice Review are those judged by the Screening Committee to represent relatively minor potential breaches of the Code of Ethics or questionable professional practice, such that they may be remedied through the challenge brought by the PR Panel and a subsequent letter of advice or warning. We regard all breaches as serious, but we consider levels of seriousness of the actual breach. Cases referred to Practice Review include breaches of confidentiality, or minor breaches of the *Code of Ethics* such as non-professional contact with the patient and therapist outside of the session.'
- 11.13 The Panel considered the information provided by BPC and the documents describing the process. The Panel accepts that it may be appropriate to have a method for handling concerns that are minor matters and that it may not be appropriate to publish the outcomes. The Panel, however, was concerned that the PRP appeared to be used for potentially serious concerns. It considered that where a breach of the Codes or Standards had occurred then outcomes should be published. The Panel noted that there was very little guidance on what matters should be sent to which route and that the examples seen of cases handled through the PRP, appear to involve significant breaches. There was a danger that serious matters would be sent to the confidential, more lenient procedure.
- 11.14 The Panel also considered that complainants should not have to present their own case in the PRP, given their vulnerability. The issues being reviewed by the PRP are not disputes over fees or other minor concerns but involve breaches of the BPC's Codes and should be presented by the BCP. The Panel also noted the lack of clarity over the escalation between the PRP route and the hearing route.
- 11.15 The Authority reviewed the online register and noted that it wasn't clear how sanctions would be recorded on the register and as a result how the public could make informed decisions about their treatment. BPC told us that 'We

are looking at how sanctions that need to be recorded publicly on the website and working with our website designers to see how best to do this. We are strengthening internal processes to ensure that if there were any sanctions that needed to be displayed on the register, these would be notified to the comms/database teams.'

- 11.16 BPC has a dedicated [page](#) for the publication of outcomes from hearings on its website. Service users are directed to check this page if they are unable to find a registrant on the register. The Complaints Decisions page states 'We publish details of decisions that have been upheld at a Fitness to Practise Hearing. At times it may not be in the public nor a Registrant's interest to publish the full details of an upheld decision, the BPC will consider each case individually.'
- 11.17 The Authority reviewed the *Sanctions Guidance* and the [Complaints Procedure](#) and noted that neither were clear about the publication of sanctions. The Authority noted that the *Complaints Procedure* allows Hearing Panels to issue an admonishment (with or without conditions), but the *Sanctions Guidance* doesn't reference admonishments as a separate sanction. The Authority noted that the '[Complaints decisions](#)' page states that 'at times it may not be in the public nor a Registrant's interest to publish the full details of an upheld decision, the BPC will consider each case individually.'
- 11.18 BPC confirmed that what it would publish would depend on the specific context of the case and that it will publish sanctions following a full hearing but does not publish interim measures, nor outcomes from the PRP procedure. BPC's rationale for this is that such publication might distress the registrant's other patients and that it is in those patients' interests to know as little as possible about the registrant. The Authority does not accept this rationale.
- 11.19 In our report [Maximising the contribution of regulatory bodies' registers to public protection](#) we state: 'We recommend that regulators should provide information about all current fitness to practise sanctions on the online register.' We consider this as best practice for Accredited Registers. We recognise that, in respect of relatively minor instances of poor practice, regulators and registers may take action (e.g. advice) which is not published, but regulators and registers should have clear criteria for the is approach. However, the overriding principle guiding AR's choice on when to publish sanctions should be whether it is in the public interest. Transparency of the register is key in allowing members of the public to make informed decisions and promotes public confidence in the process. We would expect this to be the guiding principle in BPC's decisions about the publication of sanctions.
- 11.20 The BPC publishes a plain English guide to help complainants make a complaint. The Guidelines for Making a Complaint are also published on BPC's website. These describe the process of making a complaint and what happens in both the PRP and the Hearing Panel. The Authority noted however that it does not explain the potential outcomes of the PRP. The guidance is also not specific about the support that BPC will offer to complainants of the fact that the SC will share the complaint with the registrant. The Authority also noted that the guidance uses terms such as realistic prospect and the public interest test, but that it doesn't fully explain

them. The Panel noted that these tests appeared to have a different meaning in the context of the BCP process from how they are more commonly used by the statutory health professional regulators which could be confusing.

- 11.21 The Panel was concerned that the BCP's process for dealing with complaints is not transparent, provides insufficient guidance for participants (whether complainant, registrant or adjudicator), and that there is a danger that serious matters may be being considered at the wrong level and that patients and others who need to be aware of such decisions may not be able to access them. It decided to issue the following Conditions:

BPC should:

- a) Provide a report to the Accreditation team on the number of cases taken through the PRP and hearing route since the procedure was implemented. The report should include information on the allegations and the outcomes. This is to be completed within 3 months. (Condition 2)
- b) Review its procedure and associated guidance documents and provide a report to the Accreditation team within six months. The review should include the criteria for deciding the route the complaint should take, the purpose of the different routes, the sanctions available for both routes and how and whether these are published, the purpose of interim orders and the way in which cases are presented and should address the Panel's concerns. (Condition 3)
- c) Provide the Accreditation team within six months an implementation plan for any changes made as a result of the review. (Condition 3)

- 11.22 The Panel found that this Standard is met subject to the Conditions noted above.

### Share your experience

- 12.1 The Accreditation team did not receive any responses to the invitation to share experience but did receive one concern about BPC during the accreditation year. The concern is discussed in more detail under Standard 11.

### Impact assessment

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

### Equality duty under the Equality Act 2010

- 14.1 The Authority had regard to its duty under the Equality Act 2010 when considering its decision to reaccredit the BPC with Conditions.