

Accreditation renewal report

Standards 2-8

British Acupuncture Council (BAcC)

May 2022

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About the British Acupuncture Council

The British Acupuncture Council (BAcC) registers:

- Acupuncturists practising traditionally based systems of acupuncture (TBSA)

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 January 2022, there were 2156 registrants on BAcC's register.

BAcC was first accredited on 14 March 2013.

In May 2022 we renewed BAcC's accreditation with Conditions and Recommendations, as set out in this report.

Background

The Professional Standards Authority accredits registers (“Registers”) of people working in health and social care occupations not regulated by law. To be accredited, organisations holding such registers must prove they meet our eight Standards for Accredited Registers¹ (the Standards). Once accredited, we check that registers continue to meet our Standards.

The current Standards were introduced in July 2021. This year, Registers will be assessed separately for Standard One. Standard One checks eligibility under our legislation, and if accreditation is in the public interest. This report covers Standards Two to Eight.

Registers usually have a full assessment against the Standards once every three years. They have an ‘annual check’ to see if there have been any significant changes or concerns since the previous assessment, in the meantime. More information about how we check that registers continue to meet our Standards can be found in our guidance².

A full renewal assessment includes a review of:

- Evidence submitted by the register against our Standards
- Responses from stakeholders to our ‘Share Your Experience’ consultation
- An audit of the register and complaints handling processes

We check this information against our Minimum Requirements for accreditation³. An Accreditation Panel then decides whether the Standards are met. The Panel can issue Recommendations and Conditions.

- **Condition** – Sets out the requirements needed for the register to meet the Standards, within a set timeframe.
- **Recommendation** – areas that would improve practice and enhance the operation of the register.

¹ https://www.professionalstandards.org.uk/docs/default-source/publications/standards/standards-for-accredited-registers.pdf?sfvrsn=e2577e20_6

² https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/guidance-documents/annual-review-process-guide.pdf?sfvrsn=e5c7220_18

³ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-evidence-framework-for-standards.pdf?sfvrsn=55f4920_6

Outcome

We renewed the BAAC's accreditation with Conditions and Recommendations.

Positive findings about BAAC:

- BAAC has published comprehensive information about the evidence base for acupuncture. These resources will assist registrants to promote accurate and helpful information about the benefits of acupuncture and related practices.
- BAAC has developed advertising guidance for registrants.
- We saw that BAAC is taking action to address registrants' websites that do not comply with its codes.
- BAAC has committed to developing and publishing its vision for Equality, Diversity and Inclusion (EDI). It aims to collaborate with registrants and staff from diverse groups to set its vision for EDI.
- We saw that work is already in progress to address some issues identified in our assessment.

Conditions

1. BAAC's new register website must clearly communicate the following:
 - a) information about its requirements and processes for registration and renewal, referencing its codes of conduct, required level of education, insurance, CPD and other essential requirements. (paragraph 2.6)
 - b) BAAC must publish definitions of its categories of registration. (paragraph 2.12)
 - c) BAAC must publish registrants' identification numbers against their register entries. (paragraph 2.16)
 - d) BAAC must publish its Exceptional Circumstances policy setting out how it will approach requests not to appear on the public register. (paragraph 2.19)
 - e) BAAC must make its regulatory and complaints handling roles clear on its website landing page. (paragraph 5.4)

BAAC must provide its plan of how its requirements will be addressed on its new website within three months of publication of this report.

2. BAAC must review and update its risk matrix. The matrix must demonstrate awareness of the risk that registrants' advertising may, if unaddressed, lead to harm. BAAC must provide an updated version of its Risk matrix to the Accreditation team within three months of publication of this report. (paragraph 7.5)

Recommendations

1. BAAC should develop proportionate appeals procedures for applicants found not to meet its standards for entry. (paragraph 2.8)

2. BAcC should develop protocols to ensure the appropriate handling of safeguarding concerns, referrals to appropriate bodies, and that actions it takes do not conflict with that of other bodies. (paragraph 3.14)
3. BAcC should develop mechanisms to assure that all its registrants hold current insurance. (paragraph 3.18)
4. BAcC should develop and carry out its policy review schedule. (paragraph 4.7)
5. BAcC should develop 'indicative sanctions', screening and other guidance to help assure that complaints decisions are fair, consistent, and transparent. (paragraph 5.7)
6. BAcC should consider how it can assure that it learns from complaints decisions. (paragraph 5.9)
7. BAcC should publish excerpts from its Governing Board minutes, relevant committees' meeting minutes, or other key documents, that are in the public interest. (paragraph 6.8)
8. BAcC should periodically review its risk register to ensure that it is monitoring risks relating to the practice of registrants, and the effectiveness of its mitigating actions. (paragraph 7.7)

Assessment against the Standards for Accredited Registers

Standard 2: Management of the register

- 2.1 Information on how to join BAcC's register and appear on its 'Find an acupuncturist service' is presented on BAcC's Join Us webpage⁴.
- 2.2 At the time of assessment, registration was open only to graduates of courses accredited by the British Acupuncture Accreditation Board (BAAB). The BAAB accredits higher-education level programmes leading to professional acupuncture qualifications. We checked BAcC's standards of education and training under Standard 4.
- 2.3 BAcC previously accepted applications from practitioners who could pass a test of competence of traditional-Chinese acupuncture. BAcC had closed this route to help manage its resource capacity during the Covid-19 pandemic. BAcC told us that if it does re-open this route to the register, it will first review that process and develop an appeals procedure. BAcC must notify us prior to re-opening this route so we can consider if a Notification of Change assessment is required⁵.
- 2.4 We noted that applicants are invited to email BAcC to request an application form and will be provided with information about its standards and entrance requirements. Applicants and renewing-registrants must complete a mandatory declaration form confirming they will meet BAcC's requirements.
- 2.5 We considered that while BAcC's professional codes and standards of practice are published on its website, these are not clearly linked to BAcC's registration processes. There is also no information about essential requirements such as holding indemnity insurance, and completion of CPD. Following our overall assessment, we issued BAcC **Condition One** which requires it to publish information relating to several Standards when it releases its planned new website. As part this we required BAcC to publish information about its application requirements and processes.
- 2.6 **Condition 1a:** BAcC must make its requirements and processes for registration and renewal clear, referencing its codes of conduct, level of education, insurance, CPD and other essential requirements.
- 2.7 BAcC requires registrants who voluntarily left the register over three years ago to re-apply by completing a self-assessment of their competence. Applications will be rejected if insufficient information was provided. We noted there is no appeal process for if applications through this route are rejected.
- 2.8 **Recommendation One:** BAcC should develop proportionate appeals procedures for applicants found not to meet its standards for entry.

⁴ [Join Us – BAcC \(acupuncture.org.uk\)](https://www.baccred.org.uk/join-us)

⁵ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/guidance-documents/notification-of-change-process-guide.pdf?sfvrsn=33d37520_8

- 2.9 People wishing to find a registered acupuncturist can check the Practitioner Register⁶ and Find An Acupuncturist (FAA)⁷ pages on BAaC's website. The Register provides a list of registrants and links to individuals' member profiles.
- 2.10 We noted that BAaC has non-practicing and 'Fellowship' levels of registration. Non-practicing registrants do not appear on the public register or FAA. Fellows only appear if they also meet BAaC's registration requirements.
- 2.11 We considered that while BAaC does not have many grades of registration, those it does have are not clearly explained on its website. There was a potential risk that people could assume that, for example, practitioners marked as 'non-practising members' may be insured when they are not required to be. We required BAaC to address this as part of **Condition One**.
- 2.12 **Condition 1b:** BAaC must publish definitions of its categories of registration.
- 2.13 BAaC's register entries do not include the level of qualification a registrant holds; however all registrants will have BAAB accredited qualification, or have been assessed as having equivalent competence under its now-defunct equivalence process. Although routes to the register are limited and clearly defined, it is important that the register provides information about qualifications or training that have led to registration. We required BAaC to address this as part of **Condition One**.
- 2.14 BAaC told us that its new website will allow registrants to provide a short biography covering their special interests and additional training. The information will be checked by BAaC before publication to ensure these met its standards. Registrants would not be able to remove or alter essential information from their profiles.
- 2.15 BAaC allocates unique identification numbers to registrants however these are not published on the register. This may make it difficult to distinguish between similarly named registrants, particularly if they work in the same area and across multiple clinics. We required BAaC to publish registrant identification numbers on its public register as part of **Condition One**.
- 2.16 **Condition 1c:** BAaC must publish registrants' identification numbers against their register entries.
- 2.17 We require Accredited Registers to publish all practitioners that meet its standards for registration on their public registers. At its initial assessment, BAaC raised the issue of a registrant wishing to not be displayed on the register as this would expose them to a real risk of harm. We accepted this and developed a precedent requirement for registers to set out the circumstances that registrants might not appear on the register. These were then referred to as 'exceptional circumstances' policies.
- 2.18 We noted that BAaC's Exceptional Circumstances policy is no longer visible however its website states that registrants could choose not to be published, but it could be contacted for information about a practitioner. BAaC's reasons for allowing requests for removal were not explained to the public and it was not clear what would happen if a registrant under sanction made such a

⁶ [Practitioner register – BAaC \(acupuncture.org.uk\)](https://www.acupuncture.org.uk/practitioner-register)

⁷ [Find an acupuncturist – BAaC \(acupuncture.org.uk\)](https://www.acupuncture.org.uk/find-an-acupuncturist)

request. We required BAcC to publish its Exceptional Circumstances policy as part of **Condition One**.

- 2.19 **Condition 1d:** BAcC must publish its Exceptional Circumstances policy setting out how it will approach requests not to appear on the public register.

Standard 3: Standards for registrants

- 3.1 At the previous Annual Review, we considered concerns that BAcC registrants' advertising may have breached standards set by the Advertising Standards Authority (ASA) and Committee for Advertising Practice (CAP). Following our assessment, we issued the following Conditions:
- 3.2 **2021 Condition Two:** BAcC was to complete a review of its Codes and relevant guidance to ensure that its requirements in terms of advertising are clear for registrants. Their review was to ensure that expectations of registrants to provide clear and accurate information applies in face-to-face settings, as well as written communications and advertising. BAcC was to provide copies of any updated policies, procedures and guidance to the Authority within three months of publication of the Condition.
- 3.3 **2021 Condition Three:** BAcC was to carry out a review of the information it provides on its own website to ensure consistency with the CAP codes and develop a system to ensure that its registrants are also in compliance with those codes. BAcC was to provide a report to the Authority within three months of publication of the Condition, describing outcomes of the review and the monitoring system put in place.
- 3.4 **2021 Condition Four:** BAcC was provide a report to the Authority after the first three months of monitoring had taken place, setting out findings and actions taken.
- 3.5 We found that BAcC had met the above Conditions. We published reports of Conditions Two and Three⁸ and Condition Four⁹ confirming this.
- 3.6 Following our 2022 review we were satisfied that appropriate standards for professional behaviour, including advertising, were set out in BAcC's Code of Professional Conduct and Code of Safe Practice. BAcC's requirements make clear that registrants' advertising must conform to CAP Codes, as well as its own current guidelines. BAcC showed us its Guide to Advertising, monitoring processes and other material relating to the above Conditions.
- 3.7 BAcC shared with us proposed sanctions it could apply if a registrant breached its advertising standards. If a registrant advertised a treatment without being able to provide sufficient evidence of its efficacy, different sanctions could be applied. Claims would be tested against four levels of known evidence ranging from 'evidence of positive effect' to 'no evidence of effect'. Depending on the level breached, and any ruling by the ASA, actions taken would include noting that that registrant was in breach of its advertising

⁸ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/panel-decisions/bacc-2021-condition-review.pdf?sfvrsn=42834820_4

⁹ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/panel-decisions/2112-bacc-condition-4.pdf?sfvrsn=62954b20_2

- standards on register entries or referring the registrant to a Professional Conduct Hearing.
- 3.8 We considered that the proposed sanctions appeared to rely on the authority and decisions of the ASA rather than the standards BAcC set for registrants. We considered that breaches of its standards for any 'level of evidence', might potentially require consideration under BAcC's disciplinary processes. We acknowledged that BAcC continued to work on these processes and would review developments at its next annual check.
 - 3.9 We will also check up on BAcC's monitoring processes as well as conducting our own checks. BAcC should keep its processes under review and depending on its findings over the next year, consider if its current 1% of registrants audit is sufficient.
 - 3.10 BAcC's Standards of Competence are set out within its Standards of Education and Training for Acupuncture (SETA) which must be delivered by training providers with BAAB accreditation. They set out the outcomes required to meet BAcC's entry standards. Graduates of BAAB-accredited courses are eligible to register with BAcC.
 - 3.11 BAcC provided us with comprehensive information about its CPD requirements. We noted that CPD requirements were not made clear on the Join Us webpage. We required BAcC to address this as part of **Condition One**.
 - 3.12 We noted that BAcC has a comprehensive 'Safeguarding young people and vulnerable adults policy' which helps registrants to appropriately report concerns about the welfare of children, young people and adults at risk because of abuse, neglect or self-harm.
 - 3.13 We also wanted to understand how BAcC would manage safeguarding concerns. BAcC confirmed its safe practice officer has undertaken safeguarding training but it does not have its own protocols. In line with decisions for other Accredited Registers, we issued a Recommendation:
 - 3.14 **Recommendation Two:** BAcC should develop protocols to ensure the appropriate handling of safeguarding concerns, referrals to appropriate bodies, and that actions it takes do not conflict with that of other bodies.
 - 3.15 We were satisfied that appropriate standards for business practice were set out in BAcC's Code of Professional Conduct and Code of Safe Practice. These included licensing requirements, clinical hygiene standards, and requirements to prominently display fee structures within clinic or treatment rooms.
 - 3.16 We noted that BAcC requires registrants to hold indemnity cover, and unless registrants are also medical practitioners or practising 'high risk therapies', they must use BAcC's insurance provider. We did not think that BAcC's requirements in this area are made clear on its website. We required BAcC to address this within **Condition 1a**.
 - 3.17 BAcC also told us that at present, it does not require registrants not covered by its own insurance scheme to provide evidence of their insurance cover at annual renewal of registration. We considered that BAcC should have

mechanisms in place to assure that all its registrants hold current insurance and issued a Recommendation.

- 3.18 **Recommendation Three:** BAaC should develop mechanisms to assure that all its registrants hold current insurance.

Standard 4: Education and training

- 4.1 BAaC registrants must have graduated from a British Acupuncture Accreditation Board (BAAB) accredited training provider that deliver the competencies set out in BAaC's Standards of Education and Training (SETA).
- 4.2 BAAB-accredited programmes provide training at Quality Assurance Agency (QAA) Framework for Higher Education Qualifications Level 6. This is equivalent to a Bachelor of Science (BSc). Of BAAB's seven accredited providers, four offer QAA-assured BSc(Hons) degrees. The remaining three award 'licentiates'.
- 4.3 Some existing registrants may have previously been assessed as meeting BAaC's standards through objective equivalency-assessments, however this route to the register has been removed.
- 4.4 We noted that BAaC's SETA and public Standards of Practice for Acupuncture (SPA) were over ten years old and asked BAaC about its plans to review its training standards. BAaC confirmed that a review of the SETA is currently underway. BAaC aims to complete the revised SETA, and accompanying SPA within 2022. We will check this in due course.
- 4.5 BAaC assures that the BAAB is delivering accreditation of training on its required standards through its representation on the BAAB's board, and through regular consultation. BAaC told us that any concerns about BAAB would be considered by BAaC's Governing Board and if not addressed could result in the termination of their relationship. We noted the further assurance of some courses which provided BSc qualifications.
- 4.6 We checked BAaC's 'policy prioritisation' tool for determining when policies and codes are reviewed. BAaC confirmed it is also establishing procedures to ensure that it keeps good records of policies and when they were last reviewed. We felt this was important and issued a Recommendation.
- 4.7 **Recommendation Four:** BAaC should develop and carry out its policy review schedule.
- 4.8 BAaC considers its SETA to be commercially sensitive and does not publish these, however publishes its Standards of Practice for Acupuncture (SPA) which provides similar information. We checked both during our assessment.
- 4.9 We considered how BAaC makes its education and training standards explicit within its application requirements. Following our review, we issued **Condition One**.

Standard 5: Complaints and concerns about registrants

- 5.1 At our last review in April 2021, we considered that BAaC could better highlight its regulatory role, and advise how to raise concerns, on its website home page. We issued the following Recommendation:

- 5.2 **2021 Recommendation One:** BAcC should consider including a passage which is explicit about its regulatory and complaints handling role on its website landing page.
- 5.3 BAcC had not updated its homepage to provide this information. We were aware that BAcC was developing its new website and required them to provide this information, as part of **Condition One:**
- 5.4 **Condition 1d:** BAcC must make its regulatory and complaints handling roles clear on its website landing page.
- 5.5 We checked BAcC's complaints procedures and considered that it met our minimum requirements for this Standard. We set out some areas that could help BAcC improve its complaints handling.
- 5.6 We felt it is important that Accredited Registers have a way of making sure decisions are consistent. We considered that BAcC may benefit from development of 'Indicative Sanctions Guidance' and 'screening guidance' to assist its complaints personnel and Panels to ensure that decisions are fair, consistent and transparent.
- 5.7 **Recommendation Five:** BAcC should develop 'indicative sanctions', screening and other guidance to help assure that decisions are fair, consistent, and transparent.
- 5.8 We suggested that BAcC could consider how it could assure that it learns from the decisions of its complaints panels. Conduct, health or appeals decisions could be reviewed by its Governing Board or committees for themes arising, new risks or other lessons.
- 5.9 **Recommendation Six:** BAcC should consider how it could assure that it learns from the decisions of its complaints panels.
- 5.10 We had not observed a BAcC complaints hearing for some time. We have asked BAcC to tell us when one is next held.

Standard 6: Governance

- 6.1 BAcC is a Private Limited Company by guarantee and funded through registrant fees. We reviewed records from Companies House and noted that BAcC is up to date with filing records.
- 6.2 We noted that BAcC's published 2020 Annual Review highlighted financial losses resulting from the impact of the Covid-19 pandemic. BAcC had reduced its running costs to address those losses while developing its new website and membership system. We noted that BAcC's plans to rebuild its reserves, and that it appeared to have sufficient resources to operate its register and if necessary, withstand legal challenges.
- 6.3 When checking BAcC's governance arrangements we noted it did not appear to have up to date business continuity or catastrophe plans. BAcC told us it would develop these with lessons learned from its experience of the Covid-19 pandemic and its office's shift to online or remote working. We will check these in due course.
- 6.4 During the assessment we could not find a clear process to raise a complaint about BAcC. BAcC highlighted this was accessible from its Professional

codes & Complaints webpage. We will check how this link is presented on BAcC's new website.

- 6.5 We checked whether BAcC provided an organisational statement on Equality, Diversity and Inclusion (EDI), setting out its commitment to EDI and how it will promote this. BAcC advised it was developing its policy and aimed to work with registrants and staff from diverse groups to set its vision for EDI. BAcC provided its draft policy that states: 'BAcC are committed to equal opportunities for all, regardless of gender, marital status, age, physical status, or any disability, racial or ethnic origin, nationality, creed or religious belief, sexual orientation, gender identity, age, or employment status.' We will seek updates on BAcC's EDI policy and statement in due course.
- 6.6 We considered BAcC's commitment to openness and transparency, noting that information about its governance is published on its current website. BAcC allows up to two registrants or members of the public to attend public sessions of its board meetings.
- 6.7 BAcC told us that its new website will allow its registrants to access redacted Board minutes. BAcC told us that it did not aim to allow the public to access these as they may be commercially sensitive, which presented a risk to its sustainability. We understood BAcC's rationale but considered that publishing information about decisions relating to its register could promote confidence in the register, and in its leadership. We therefore issued the following Recommendation:
- 6.8 **Recommendation Seven:** BAcC should publish excerpts from its Governing Board minutes, relevant committees' meeting minutes, or other key documents, that are in the public interest

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

- 7.1 At the previous Annual Review, we issued the following Condition relating to BAcC's management of risks:
- 2021 Condition One:** BAcC must review and update its risk matrix to ensure that risks relating to misleading advertising are adequately considered. BAcC must provide an updated version of its Risk matrix to the Accreditation team by the time of its next assessment.
- 7.2 As discussed above, we had considered concerns raised that BAcC's registrants may not have advertised in line with ASA and CAP Codes. We had noted that while BAcC did have a risk relating to advertising within its risk matrix, it may not fully capture the extent of the risk or effectiveness of the mitigating actions BAcC had in place. BAcC would be able to capture such information from, for example, its monitoring of registrants' websites.
- 7.3 BAcC provided its updated risk matrix which set out a risk that registrants' advertising may not be 'legal, decent, honest and truthful' and in line with its Code of Professional Conduct. BAcC aimed to mitigate the risk of mis-selling services by developing registrants' all-round communication, from websites to the consultation-room, so that registrants could ensure their clients were best informed.

- 7.4 We considered that the wording of the risk, and update, did not appear to expressly acknowledge a risk that registrants may inadvertently or deliberately advertise practices that could directly or indirectly lead to harm. We felt the risk of harm to the public should have been stated and considered within BAcC's risk matrix. We considered that BAcC should reference such risks within its matrix and include their mitigations, such as its monitoring and ability to initiate disciplinary procedures where required. We therefore issued the following amended Condition:
- 7.5 **Condition Two:** BAcC must review and update its risk matrix. The matrix must demonstrate awareness of the risk that registrants' advertising may, if unaddressed, lead to harm. BAcC must provide an updated version of its Risk matrix to the Accreditation team within three months of publication of this report.
- 7.6 We did not see evidence that BAcC's leadership regularly reviewed the risk matrix or similar tool. BAcC advised it was currently updating its policies, procedures and codes, including its practitioner risk register. The risk register would be reviewed by BAcC's Professional Standards and Regulatory Committee (PSRC) and Governing Board. We issued the following Recommendation:
- 7.7 **Recommendation Eight:** BAcC should periodically review its risk register to ensure that it is monitoring risks relating to the practice of registrants and the effectiveness of its mitigating actions.
- 7.8 We looked at how BAcC's website communicates the risks and benefits of the services offered by registrants. We noted that information about treatments offered by registrants is provided on BAcC's 'Evidence A-Z' webpages. We noted that BAcC appeared balanced in its presentation of evidence and included reviews that were both for and against the effectiveness of acupuncture when treating particular conditions.

Standard 8: Communications and engagement

- 8.1 We found that in general, BAcC provides clear and user-friendly information about itself and its role, targeted at different audiences, on its website and in social media. BAcC's homepage provides access to its standards, its published register, and FAA. We noted the comprehensive information provided about the evidence base for acupuncture, including guidance on how the strength of evidence for or against a treatment can be tested.
- 8.2 However, in the above Standards we considered that BAcC did not sufficiently set out its standards for registrants in several areas. We considered it would be appropriate for BAcC to address our findings on its new website, which was under development. These are listed within Condition One.
- 8.3 We also noted that BAcC kept many resources that many be of interest to the general public in the members-only section of its website. We suggested that BAcC may wish to periodically consider what information might be released in the public interest.
- 8.4 BAcC appeared to work collaboratively with relevant stakeholders, such as its insurance provider, to identify themes affecting registrants' practice and develop guidance around these accordingly

Share Your Experience

- 9.1 We did not receive any new concerns or feedback about BAcC over the previous year of accreditation. We considered a concern raised previously that BAcC may not have investigated potential breaches of its codes, however saw no recent evidence that BAcC failed to act on concerns raised against registrants, or against itself.

Impact assessment (including Equalities Duty)

- 10.1 We considered the impact of our decision to renew accreditation of BAcC, with Conditions. We acknowledged the work that BAcC had done to assure registrants could advertise their services to the public while adhering to its standards.
- 10.2 We did not identify any adverse impacts and think that the Conditions will help to ensure greater transparency of information about its standards for registrants and members of the public. In recognition that BAcC is continuing to develop its processes, and is building a new website, we have aimed to allow enough time for it to meet the Conditions set.
- 10.3 We also took account of our duty under the Equalities Act when making this decision. We did not identify any adverse impacts on groups with protected characteristics arising from BAcC's work or our decision to renew accreditation.