

Annual review of accreditation 2020/21

British Association for Counselling and
Psychotherapy (BACP)

August 2021

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About the British Association for Counselling and Psychotherapy

The British Association for Counselling and Psychotherapy (BACP) registers:

- Counsellors
- Psychotherapists

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 their skills up to date through continuing professional development
- Handling complaints and concerns raised against registrants and issuing sanctions where appropriate.

As of March 2020, there were 40,040 registrants on BACP's register. BACP was first accredited on 5 March 2013. This is BACP's eighth annual review and this report covers 5 March 2020 to 5 March 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.

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.

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

Outcome

Accreditation for BACP was renewed for the period of 5 March 2021 to 5 March 2022.

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

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

1. BACP should review its communications with parties involved in complaints processes to assure they are appropriate and sensitive to the matters under consideration. (paragraph 11.7)
2. BACP should review its processes to assure that parties to complaints are aware of their ability to request reasonable adjustments throughout the complaints processes and that any such requests are managed appropriately. (paragraph 11.7)
3. BACP should review its risk assessment processes to assure there is appropriate triage, monitoring and ability to take action to protect the public where necessary. This should include how parties to complaints are kept updated. (paragraph 11.15)

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 BACP reported that its registrant membership had increased from 37,160 to 40,040 since the previous annual review.
- 1.2 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 that BACP's Public Protection Committee (PPC) had developed a [public protection strategy](#), published in January 2021 which highlighted its commitment to 'continuous improvement in (BACP's) regulatory functions, adaptivity, ensuring increased understanding of and confidence in (BACP's) regulatory functions and public protection role'.
- 2.2 The Authority had received a concern about BACP's training curriculums covering areas such as white fragility, white privilege and unconscious bias. The concern stated that a resolution concerning Equality, Diversity and Inclusion (EDI) was passed at a BACP Annual General Meeting without meeting the 5% threshold.
- 2.3 BACP advised that the resolution, regardless of not having met the required threshold, had been in line with BACP's EDI strategy and direction of work. The Authority positively noted BACP's approach to increasing diversity within the roles it registers and its aim to increase access to talking therapies.
- 2.4 The Authority found that this Standard continues to be met.

Standard 3: risk management

- 3.1 When applying for Accreditation and at annual review, registers provide a risk matrix demonstrating their identification and mitigation of risks to the public associated with their registrants' practice, including their personal behaviour, technical competence and business practice. Registers detail the likelihood and impact of risks when occurring outside of registration, and again with the mitigation of such risks that registration provides.
- 3.2 BACP had listed new risks resulting from the Covid-19 pandemic. These included risks relating to:
 - Increased use of telephone and e-counselling, mitigated by new [Online and phone therapy competence framework](#) and [Online and phone therapy user guide](#) for registrants.
 - New applicants not having sufficient experience of face-to-face ('F2F') work with clients, mitigated by requirements for providers to assure competence and additional CPD for supervisors to assure newly graduated supervisees.

- Unexpected endings or breaks in therapy due to the pandemic, mitigated by [clinical wills](#) and the use online-counselling to minimise risk of infection.
 - Difficulties for registrants in meeting supervision requirements, mitigated by [alternate forms of supervision, including online.](#)
- 3.3 BACP reported that such risks were identified through its 'upstream prevention' work, from sources including its Certificate of Proficiency testing, and its public 'Ask Kathleen' service (now its [Get Help With Counselling Concerns Service \(formally Ask Kathleen Service\)](#)). BACP reported it had recruited a Data Analyst to identify and report on themes identified.
- 3.4 During previous annual reviews, the Authority had considered each Accredited Register's approach to safeguarding issues in terms of how well-prepared registers are to protect children, young and vulnerable people from abuse and neglect. The Authority had noted relevant BACP standards and the resources available to BACP registrants and students training on BACP-accredited courses.
- 3.5 BACP advised how it responded to safeguarding concerns including that it has provided training on safeguarding legislation, using information under the UK General Data Protection Regulation (UK GDPR), and the role and remit of a Local Authority Designated Officer. In line with previous decisions, at its last annual review the Authority issued a Recommendation for BACP to further develop its internal safeguarding processes, ensuring that they are integrated effectively with the roles and responsibilities of other authorities (in particular local authorities, police and schools). This would make clearer to registrants, the public, and its own staff what information received may be disclosable and legal limitations around this.
- 3.6 During this review, BACP advised that it had developed an interim protocol that 'will enable clear information to be given to members and the public when BACP receives information relating to safeguarding matters, i.e. what it is able to do, what is disclosable, what can be processed and how legal limitations may prevent BACP from processing or even holding information'. The protocol advises which issues are to be raised with its Associate Solicitor for further review. BACP advised a task and finish group will 'draw together a comprehensive BACP safeguarding policy which will include the processes already being carried out'.
- 3.7 BACP provided its 'Safeguarding Referrals – Team Protocol' which outlined relevant legislation (such as The Children Act 2004 and The Safeguarding Vulnerable Groups Act (SVGA) 2006). The protocol states that should a BACP staff member receive a safeguarding referral or recognise a safeguarding issue, advice should be requested from the Associate Solicitor or Assistant Registrar. A list of possible matters requiring advice is provided for example, 'information that a complainant/member may endanger their own or another's life'. Further internal information is signposted. BACP advised that the final draft of its comprehensive policy was due for completion by Autumn 2021.
- 3.8 The Authority found that the Recommendation had been considered.

3.9 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 BACP reported increased income due to an increase in membership numbers. BACP advised that it decided in March 2020 not to increase membership fees due to the impact of the Covid-19 pandemic on registrants' incomes and changes in ways of working. BACP also reported that it now provides free access to its journals, CPD articles and other resources to assist practitioners during the Covid-19 pandemic.
- 4.2 As part of its due diligence, the Authority reviewed financial information including BACP's [Annual review and financial statements 2019 to 2020](#), records from Companies House and the Charity Commission and found that this Standard continues to be met.

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

- 5.1 BACP's Articles of Association were amended following 'special resolutions' passed at its Annual General Meeting held on 4 December 2020. BACP confirmed the following changes were made, and that they did not directly affect the register:
1. 'A special resolution updating the Articles of Association enabling the Board to call future general meetings electronically (virtually) or to hold a combination of an electronic and physical meeting.
 2. A special resolution that aligns the tenure of the Chair and Deputy Chair to that of the term of all the other trustees
 3. A special resolution to allow the Board to increase the number of appointed Trustees from four to five.'
- 5.2 The Authority had received a concern that BACP had refused to disclose statistical information about handling of complaints not already within its regular publications. The complainant was aware BACP is not subject to Freedom of Information requests but argued that BACP should operate within good regulatory practice by being transparent and providing information relevant to regulatory matters and the public interest. BACP advised that it would use its annual PPC reports to provide more statistical information in future.
- 5.3 The Authority had received concerns about BACP's processes for accepting resolutions and other member-led changes to its governance at the previous review. New concerns were received suggesting that members' voices were minimised. BACP advised that it is aiming to increase member engagement levels with the AGM by including relevant content through its communication channels. It has introduced a mechanism for obtaining member feedback on routine forms and emails.
- 5.4 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 were no significant changes reported or noted in the past year.
- 6.2 The Authority found that this Standard continues to be met.

Standard 7: governance

- 7.1 BACP reported that its Deputy Chief Executive left on 31 March 2020 and its Chief Professional Standards Officer had taken on the Deputy CEO role as an additional responsibility. BACP also reported that its Head of Membership, Engagement and Services had been promoted to the position of Chief Operations and Membership Officer. BACP advised in May 2021 that its Registrar had left BACP and that the existing Assistant Registrar (Conduct) would take on the interim role of Acting Registrar.
- 7.2 BACP reported membership changes to its Public Protection Committee (PPC) and advised it was recruiting a new lay member. At the time of assessment the PPC had four professional members and four lay members, including the Chair. The PPC's membership, annual report and minutes or committee meetings are available at: [Governance of the BACP Register](#).
- 7.3 The PPC's [January 2021](#) meeting minutes state that the 'Committee had found it difficult to navigate to the public protection web pages and that improvement was needed'. BACP reported that in response it had undertaken work in March 2021 to address this and was also conducting research to inform the redevelopment of its entire website.
- 7.4 At BACP's previous review, the Authority had received concerns alleging harassment and threats of violence through social media from BACP registrants, and that BACP had failed to respond effectively to those concerns. BACP advised that it could act when a registrant may have breached its codes through inappropriate use of social media. Such concerns would be managed under its '[Article 12.6 procedures](#)'. This is a separate process from its Professional Conduct Procedure and allows anyone to submit a concern. The only sanction available under Article 12.6 is termination of membership (and BACP registration).
- 7.5 The Authority had checked BACP's guidance on [Social Media and Digital Technology](#). The Authority considered that guidance on sharing information about clients did not sufficiently emphasise the importance of confidentiality. Counsellors and psychotherapists deal with extremely vulnerable clients, often with complex problems and confidentiality is key to those relationships. The guidance appeared to be phrased to suggest that it was permissible to share client information, but with caution. The Authority was concerned that messaging on registrants being able to 'use social media to discuss clients with other colleagues if the collaboration is in the best interest of the client', could be interpreted by registrants on a wider definition than intended. The Authority also noted the guidance did not address the personal behaviour of registrants on social media. The Authority considered that, for example, alleged racist or bullying behaviour made within a personal context would

have professional consequences and guidance should make it clear this was unacceptable.

- 7.6 The Authority had issued a Recommendation for BACP to review its social media guidance to ensure that there is emphasis on confidentiality and to include guidance on inappropriate behaviour on social media whether in a professional or private context.
- 7.7 BACP advised that it had revised its social media guidance. The Authority checked BACP's [Social Media policies](#) which stated registrants 'should always apply the principles and values of the [BACP Ethical Framework](#) and use your ethical and professional judgement when posting content online'. The guidance noted that anything posted by registrants should be considered within the context of the counselling and psychotherapy professions. The guidance encourages registrants to be polite, respectful and kind, and to consider whether posts are in line with BACP's Ethical Framework.
- 7.8 The Authority asked how BACP's social media guidance was in line with earlier Good Practice advice which stated that registrants may 'use social media to discuss clients with other colleagues if the collaboration is in the best interest of the client'. BACP advised that registrants were required to adhere to the Ethical Framework and Data Protection legislation in all circumstances. BACP's resources advised that registrants must ensure any such references were anonymised or legally authorised. BACP advised its review of the Good Practice advice would be reviewed in 2021 to ensure that when and how social media could be used for such purposes was made clearer.
- 7.9 BACP is also developing its policies on concerns raised through social media to provide clarity on what it would consider under its complaints processes. The Authority will seek an update on these in due course.
- 7.10 The Authority had received concerns about a BACP registrant who was alleged to have made unacceptable comments to a child on social media. BACP advised that the registrant was issued a [Letter of Advice](#), used where the registrant accepts there has been a minor or technical breach of professional standards. BACP advised this example had contributed to its updated social media guidance for registrants.
- 7.11 The Authority found that the Recommendation had been considered.
- 7.12 The Authority received a concern that BACP had published job vacancies within its newsletters for a BACP-accredited provider who had made inappropriate and unprofessional claims about the services they offered. BACP advised that it had worked with the provider to amend this information and that BACP-accreditation could be removed if such issues were not addressed. BACP advised this matter would inform its review of guidance for the advertising of accredited services.
- 7.13 Concerns were raised that BACP journals had published advertisements for diet plans that may have been harmful, or at risk of contributing to eating disorders. BACP advised it had investigated the advertisements and found they did not breach its advertising policies however any potential breach identified could be managed in line with its approach to adjunctive therapies. BACP advised that following a meeting with the National Centre for Eating

Disorders BACP would review its CPD resources. BACP stated it would consider developing a competence framework for eating disorders.

- 7.14 The Authority received a concern that the BACP had published 'misinformation and often highly prejudiced/racist/ableist/trans and homophobic, views' within its journals. BACP advised that the issue of a letter published in its Therapy Today journal that caused several member complaints and it had apologised for this. BACP advised that its editor and supporting staff team review all submissions and would decline anything that breached its standards.
- 7.15 The Authority found that this Standard continues to be met.

Standard 8: setting standards for registrants

- 8.1 BACP published its '[Accountability and candour within the counselling professions](#)', which [accompanies standards set out in BACP's Ethical Framework](#), in September 2020. The guidance states that: 'Candour is defined by BACP as 'a commitment by practitioners about being open and honest about anything going wrong and to inform clients promptly if anything has occurred that places the client at risk of harm or causes harm to their wellbeing or safety, even if the client is unaware of what has occurred'.
- 8.2 The Authority asked BACP about its standards, guidance and tools for conducting risk assessments relating to suicide, following receipt of a concern.
- 8.3 BACP advised that it had conducted a review of BACP's suicide prevention resources which include member guidance, guidance for the wider profession, public information and a suite of member resources. A revised version of its guidance [GPiA042 "Working with suicidal clients in the counselling professions"](#) has been undertaken and will be published shortly, and other resource are planned. We will check for updates on the development of these materials and review the revised work in due course.
- 8.4 The Authority found that this Standard continues to be met.

Standard 9: education and training

- 9.1 BACP has continued to collaborate with other Accredited Registers on the SCoPEd (Scope of Practice and Education) project which aims to: 'systematically map existing competences, standards, training and practice requirements within counselling and psychotherapy - using an evidence-based approach to identify the different and overlapping competences between them.' Updates from BACP are published at [SCoPEd \(Scope of Practice and Education\) \(bacp.co.uk\)](#). BACP advised the group was now considering recent feedback with an aim to produce a final framework by the end of 2021.
- 9.2 The Authority had received a concern that the SCoPeD project did not address necessary competencies for working with children. BACP stated that 'SCoPEd is only looking at counselling and psychotherapy core training for working with adults'. BACP advised there were no current plans to include such specialisms prior to consideration by the SCoPEd Oversight Committee.

- 9.3 Concerns were received about BACP's communication of the SCoPeD project to its membership. BACP advised that it had engaged an external consultant to better communicate its 'vision, purpose and benefits'.
- 9.4 At the previous annual review, the Authority had considered concerns from registrants about perceived requirements to achieve BACP-Accredited practitioner status. This was understood to confer eligibility for paid positions with some counselling providers. It was suggested that, in practice, practitioners had to undertake unpaid work to obtain this status which might damage individuals financially or place a barrier to entry. The Authority noted that [BACP registration](#) recognised that a practitioner met, or exceeded, BACP's minimum standards.
- 9.5 The Authority however considered that if, in practice, practitioners had to undertake unpaid vocational work to achieve 'Accredited' status, this may impose an unfair barrier for practitioners and potentially impact on this Standard. The Authority issued a Recommendation for BACP to consider the impact of its requirements for accreditation on individuals and including how far these might affect minorities or might be an unjustifiable barrier to entry, and if so, how these could be mitigated. BACP had stated that the precedent for unpaid work was a market issue dictated by employers such as the NHS and that it made clear in its communication and policies that 'all registered members are qualified and should be paid for the work they do'.
- 9.6 BACP advised that it has processes in place to support members who disclose disabilities. These included 'telesurgeries with an Accreditation Assessor and an additional 10% word count allowance to demonstrate that BACP's criteria were met for those that declare a disability or learning difference to us.' BACP advised it also aimed to increase accessibility through online CPD courses, supplemented with downloadable transcripts and speech recognition tools.
- 9.7 BACP advised that it planned to conduct a full review of its accreditation criteria to help identify any remaining barriers to achieving accreditation. This would occur after completion of the SCoPeD project which would impact BACP's individual accreditation criteria. Following a survey of registrants, the BACP advised it aimed to address themes raised, by reducing accreditation fees for registrants with financial constraints and for those with learning disabilities. The Authority would seek updates on this in due course.
- 9.8 The Authority found that the Recommendation had been considered. The Authority encouraged BACP to ensure it consulted as widely as possible to ensure it received representative feedback from all levels of membership as well as other stakeholders.
- 9.9 The Authority noted that BACP had worked with another body 'to develop an approved level 4 diploma in therapeutic counselling which includes a Certificate of Proficiency (CoP). Practitioners who successfully complete this award will have a direct route to join the BACP Register.' The CoP allows BACP members who have not completed a BACP-accredited course to demonstrate they hold the minimum level of competence required for entry to its register.

- 9.10 The Authority had understood that BACP's minimum requirements were aligned to Level 6 of the Framework for Higher Education Qualifications (Bachelor's degree) or equivalent. The Authority asked how BACP assured that level 4 diploma courses met BACP's standards for registration. BACP responded the performance standards assessed in the CoP were mapped to descriptors used at Level 6 and that any such qualification must meet BACP's standards for content, delivery, and assessment.
- 9.11 The Authority noted that BACP's requirements for 'Approved Qualifications' require providers to 'ensure the qualification (and possible developments) meets BACP requirements, including practice and supervision, and maps to the Ethical Framework. This may include requesting changes to the qualification, its design, delivery or assessment.' The Authority will ask BACP to share outcomes of how it is monitoring whether levels of competence of quality of services offered by its members have been affected, for example by monitoring the number of concerns raised about members who have gained access to the register through this route.
- 9.12 The Authority found that this Standard continues to be met.

Standard 10: management of the register

- 10.1 The Authority considered BACP's approach to the Covid-19 pandemic at the previous annual review. BACP advised that staff had adjusted to home working over the past year, and that it had used external contractors to support progression of complaints procedures. BACP provides up to date guidance and resources for members at: [Coronavirus: Guidance for members \(bacp.co.uk\)](https://www.bacp.co.uk/coronavirus-guidance-for-members) including advice on offering therapy as lockdown restrictions were lifted.
- 10.2 BACP has developed a module with the Open University to support counsellors to move their practice online following the Covid-19 pandemic. The course, [How to do counselling online: A coronavirus primer](#) 'aims to provide a primer on working online as a counsellor or psychotherapist at a time when face-to-face therapy is neither possible nor safe. The course provides advice and guidance on how to offer technology-based counselling safely and effectively'.
- 10.3 BACP's [Public Protection Committee: 2020 Annual Report](#) stated that 98% of the 740 registrants checked under its audit process passed on their first attempt. The audit checks that BACP's CPD, supervision and indemnity insurance requirements are met. Due to the Covid-19 pandemic, BACP introduced some flexibility in deadlines as some members had difficulty obtaining the requisite information needed due to the Covid-19 pandemic. 108 extensions were granted, and 37 audits deferred to the next period. This was due to the Covid-19 pandemic and for other reasons such as serious illness, bereavement and job changes.
- 10.4 BACP reported that it had made access to CPD resources including journals and articles free to registrants and to the public. BACP's website monitoring found that these had been popular.
- 10.5 The Authority noted that the [PPC's 2020 annual report](#) reported that BACP received 94 applications for membership from applicants making [disclosures](#):

‘anything that may prejudice the public’s perception of BACP or the profession, bring BACP into disrepute or compromise the standards of good practice within the profession.’ 18 such applications for membership were considered by an independent panel, and four were subsequently rejected.

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

Standard 11: complaints and concerns handling

- 11.1 BACP reported that 267 complaints against practitioners were received from January 2020 to December 2020. Complaints resulting in professional conduct outcomes are published at: [BACP Professional Conduct Procedure notices](#). BACP reported cases had also been resolved through forms of alternate complaints resolution, including three through Letters of Advice and 13 cases that were closed through Consensual Disposal (where the registrant and BACP come to an agreement to resolve a complaint without going to a Professional Conduct Hearing). BACP reported that eight concerns had been raised against BACP as ‘service complaints’.
- 11.2 BACP had re-launched its ‘Ask Kathleen Service’ which allows people to discuss potential concerns about therapy or therapists, as its new [Get help with counselling concerns service](#) in March 2021. Information is provided on contracting between therapists and clients, contacting therapists out-of-session, abrupt ends to therapy, notetaking, and confidentiality. Guidance is provided on maintaining appropriate professional boundaries, and links to the [How to complain about a BACP member](#) webpage.
- 11.3 BACP had introduced its revised [Professional Conduct Procedure](#) (PCP) in December 2018. The new procedure aims to improve the way BACP handles complaints, improve timeliness and reduce the number of complaints that results in full hearings without compromising on protection to the public and clients. A previous Accreditation Panel had requested an audit of cases handled under the new PCP be conducted by the Accreditation Team to understand whether the new processes achieved these objectives. The Authority had intended to conduct the review at previous assessments however this had been delayed by the Covid-19 pandemic.
- 11.4 The Authority reviewed cases from different pathways of BACP’s complaints processes, including cases that were resolved through alternate forms of resolution, and cases that were appealed and/or involved reviews of decisions. The Authority checked a random sample of cases and some that it had been made aware of following concerns raised through the Share Your Experience (SYE) process.
- 11.5 The Authority did not identify significant concerns that suggested the Standards for Accredited Registers were not being met, however noted risks for BACP to address and areas for potential improvement. The Authority considered that the overall number of complaints received by BACP appeared proportionate to the number of registrants.
- 11.6 Areas identified for improvement were:
- a) Communication with individuals involved in the complaints process should be sensitive to circumstances. The Authority highlighted examples of templates being used for situations where significant harm had occurred,

which did not seem appropriate. This included a letter to bereaved parents to inform them their complaint would not be taken further, based on a standard template. BACP's communications used legalistic language when explaining decisions to registrants and complainants.

- b) More routine consideration of any reasonable adjustments that might be needed for those involved in the complaints process. The Authority noted where a complainant had requested an extension of a deadline within BACP's complaints process due to a medical condition, which had not been taken into account by BACP's response.

11.7 To address these the Authority issued the following Recommendations:

Recommendation One: BACP should review its communications with parties involved in complaints processes to assure they are appropriate and sensitive to the matters under consideration.

Recommendation Two: BACP should review its processes to assure that parties to complaints are aware of their ability to request reasonable adjustments throughout the complaints processes and that any such requests are managed appropriately.

11.8 The Authority also noted a theme of concerns regarding publication of consensual disposal outcomes from both registrants and complainants. BACP had explained its process for deciding about whether publication is in the public interest, which was considered by the Authority at the previous annual review.

Timeliness of complaints processes

11.9 As stated at paragraph 11.3, one of the aims for the new complaints handling processes was to improve timeliness. The Authority had received concerns about delays in progressing cases where serious allegations had been made. BACP had acknowledged this within its [Public Protection Committee: 2020 Annual Report](#) citing challenges caused by the Covid-19 pandemic. BACP had addressed this with the development of virtual hearings. BACP had piloted these with 'initial stages' hearings that 'enabled BACP to assess complaints which met the test for a hearing and to reject and close those that did not.'

11.10 BACP had informed the Authority that due to the use of external contractors all standing complaints were completed at the Investigation and Assessment Committee (IAC) stage. BACP advised as of April 2021 it had a backlog of 25 cases to be considered under its Disciplinary Review track and 35 cases under its Practice Review track. The oldest cases of each type were outstanding since June 2019 and May 2020 respectively.

11.11 BACP had trained its staff and contractors on running virtual hearings and following successful pilots aimed to hold all hearings virtually in future. BACP aimed to hold its first hearing in the second half of 2021.

11.12 The Authority had checked the guidance produced for virtual hearings for panels, registrants and complainants. The Authority noted that parties would be provided a pre-hearing questionnaire to inform BACP of any issues that may arise and how support can be provided.

- 11.13 The Authority asked if BACP undertook any form of ongoing risk assessment of outstanding cases to consider if interim suspensions or other action may be necessary (in addition to those that may be issued by BACP's IAC). BACP advised it had not done so and that its risk assessment had been focussed on ensuring the longest outstanding cases were addressed as soon as possible. BACP highlighted that IACs could issue interim suspensions and had done so. BACP advised however that it would prioritise cases that suggested higher levels of risk, such as whether there were multiple complaints about a registrant.
- 11.14 The Authority noted the actions taken by BACP to clear its backlog of cases and to assure that it took action to protect the public such as through interim suspensions as well as concerns raised that cases involving serious allegations may not have progressed or received updates.
- 11.15 The Authority however recognised a risk that significant delays may lead to harm and reduce the ability to inspire confidence that the register was being managed effectively. The Authority issued a Recommendation for BACP to:
Recommendation Three: review its risk assessment processes to assure there is appropriate triage, monitoring and ability to take action to protect the public where necessary. This should include appropriate updates to involved parties.
- 11.16 Given the delays associated with the pandemic, it is difficult at this point to see whether the new processes have achieved their desired goal of improving timeliness. The Authority will monitor progress with this.
- 11.17 The Authority found that this Standard continues to be met.

Share your experience

- 12.1 The Authority considered 40 responses to the 'Share Your Experience' (SYE) process during this review. Additionally, the Authority considered seven SYE submissions from the previous assessment, since they related to themes considered as part of the audit of complaints handling.
- 12.2 Themes relating to the audit and other concerns raised were addressed during the Authority's review of the Standards for Accredited Registers, above.

Impact assessment

- 13.1 The Authority considered the impact of its decision to reaccredit BACP's register.
- 13.2 The Authority noted that BACP's Approved Qualifications could remove barriers and may allow for more diversity within its register. The outcomes of the SCoPEd project might allow for collection of useful data and allow BACP to understand the impacts of such programmes.

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.

- 14.2 BACP had outlined its Equality, Diversity and Inclusion (EDI) strategies including its 'aim to 'develop and lead activity to support organisations across the UK to work with a diverse range of clients and reduce barriers to accessing therapy for under-represented communities, groups and individuals'. This included 'working with communities with historical low uptake of therapies as both clients and clinicians'.
- 14.3 The Authority checked BACP's approach to providing assistance to registrants and clients with disabilities and provided a Recommendation for BACP to address this.