

Accreditation renewal report

Standards 2-8

British Psychoanalytic Council (BPC)

April 2022

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About the BPC

The British Psychoanalytic Council (BPC) registers:

- Psychoanalysts
- Psychoanalytic psychotherapists
- Psychodynamic psychotherapists
- Psychodynamic counsellors.

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 1893 registrants on the BPC's register.

The BPC was first accredited on 20 November 2014.

In February 2022 we renewed the BPC'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 2 to 8.

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 BPC's accreditation with Conditions and Recommendations.

Positive findings about the BPC

The BPC's complaints processes have been completely revised and now include clearer information about how concerns about its Registrants are handled. This includes guidance for witnesses, clearer routes and thresholds for progressing complaints, and more prominent information about complaints on its webpages.

Summaries of Board discussions are now published to allow greater transparency about how the BPC makes key regulatory decisions.

There is new guidance for Registrants about the Duty of Candour, and whistleblowing.

Work is already in progress to address some of the areas we identified in our assessment, such as developing education and training criteria for the courses it accredits.

The BPC has used its registrant engagement programme to help promote equality, diversity and inclusion on areas such as sexual orientation.

Conditions

1. Current routes to registration should be set out in clear, published documents within six months. This should make clear how each of the BPC's Member Institutions (MIs) determine competence (for example through training or qualifications), including key course information such as expected duration of training courses. There should be clear information on how equivalence for applicants applying outside of the normal training routes is determined by the MIs. This will provide clearer information about routes to registration pending more substantive work to clarify education and training criteria. (paragraph 2.9)
2. The BPC should ensure that the process for appealing equivalence registration decisions made by the BPC's Member Institutions is consistent and robust, within twelve months. The role of the BPC's Registrar in appeals of MI equivalence decisions should be clarified as part of this. (paragraph 2.10)
3. The BPC is to publish clear information about the education and training outcomes needed for registration with the BPC within 18 months. This should set out the standards of education and training that its MIs are required to deliver for their specialisms to be accredited by the BPC. This should be used to underpin decisions by a MI that a registrant has met the requisite standards for registration with the BPC, whether through its training or demonstrating equivalence. (paragraph 4.8)

Recommendations

1. The BPC should have mechanisms in place to make sure that all sanctions are promptly displayed against individual register entries.(paragraph 2.18)
2. The BPC should provide clear and consistent explanations of the terminology used on its website about what the treatments involve, the expertise and qualifications of its registrants, and how far it has verified registrants' entries and definitions of the specialisms listed on its website. This should include clarity about the definition of 'medically qualified'. (paragraph 2.19)
3. The BPC should consider further checks to assure registrants hold appropriate indemnity cover, for example as part of its CPD audits. (paragraph 3.7)
4. The BPC should provide direct links to its Ethical Framework (or updated version once published), within its information about how to raise concerns. (paragraph 5.5)
5. The BPC should further strengthen its approach by undertaking its own scrutiny of a sample of decisions made under its new processes. (paragraph 5.17)
6. The BPC should consider how to how to ensure the perspectives of patient, service users and lay people inform the work of the Ethics Committee. (paragraph 6.4)

Assessment against the Standards for Accredited Registers

Standard 2: Management of the register

Standard 2a: The registration process

- 2.1 To be eligible for registration with the BPC, practitioners must have completed training with one of its Member Institutions (MI) or been determined by one of the MIs to have equivalent skills and experience. The BPC accredits the training delivered by the MIs.
- 2.2 The BPC updated its webpages on how to register during our assessment⁴. This sets out that applicants must contact the MI for an application form. The BPC has also published new guidance for MIs on how to assess equivalence.
- 2.3 We considered whether the current arrangements met our requirement to have clear, published processes for all routes to registration. We did not think the BPC's website provided clear information on what was required for registration and how applications would be assessed. We checked some of the MI's webpages to see if this information could be easily located. We did not find clear information about the registration process, and in some cases the MI listed registration with the BPC as a requirement for its own membership.
- 2.4 Although the BPC accredits the training delivered by the MIs, for most areas the criteria for education and training are in development. This means that it was difficult to determine how the BPC assures itself that the training delivered by MIs meets its requirements for registration. Training requirements are discussed further under Standard 4.
- 2.5 The guidance published in February 2022 for MIs on assessing equivalence⁵ specifies that the MI should have an application form for equivalence, that there should be a Scrutiny Committee in place, that a written record should be kept of the decision and that there should be an appeal process in place. It advises that equivalence criteria should ensure an equivalent standard of psychotherapy, but allows for the professional judgement of the scrutiny committee to determine this. The only core component set out in the criteria is that a practitioner should have had substantial personal therapy.
- 2.6 We consider that, for the public to have confidence in the standards of the BPC members, it is essential that:
 - Training by the various MIs should achieve a similar level or that differences should be clearly explained;

⁴ Available at: <https://www.bpc.org.uk/professionals/registrants/joining-our-register/>

⁵ <https://www.bpc.org.uk/download/5435/Updated-Equivalence-Guidance-to-MIs.pdf>

- The outcomes expected from training should be clear (in terms of knowledge, skills and behaviours) as opposed simply to hours spent in training;
 - These outcomes should be used to determine equivalence for applicants applying outside the normal training routes and in appeals;
 - The role of the BPC in respect of determining membership should be made clear and, if it is to have any appellate function, this should be expressed clearly and consistently.
- 2.7 The following minimum requirements do not appear to be met:
- Clear, published processes for all routes to registration.
 - A clear appeal process so that those applying to a register can appeal registration decisions.
 - Mechanisms in place to ensure that applicants meet its registration requirements (including those set for education and training) and registrants continue to do so.
- 2.8 To address this, the Panel issued the following Conditions:
- 2.9 **Condition One:** Current routes to registration should be set out in clear, published documents within six months. This should make clear how each of the BPC's Member Institutions (MIs) determine competence (for example through training or qualifications), including key course information such as expected duration of training courses. There should be clear information on how equivalence for applicants applying outside of the normal training routes is determined by the MIs. This will provide clearer information about routes to registration pending more substantive work to clarify education and training criteria. (See Condition Three within Standard Four)
- 2.10 **Condition Two:** The BPC should ensure that the process for appealing equivalence registration decisions made by the BPC's Member Institutions is consistent and robust, within twelve months. The role of the BPC's registrar in appeals of MI equivalence decisions should be clarified as part of this.
- 2.11 These Conditions also relate to the education and training requirements for registration, discussed further within Standard Four.

2b: the Register

- 2.12 We checked a sample of register entries during our assessment. We noticed that interim measures were published in a separate area of the BPC's website, rather than on the register entry. This means that they are less clear and may not be noticed by members of the public using the register to find a practitioner. At the time of assessment, there was one registrant under interim measures. The BPC confirmed that this was due to human error and that although there is not a separate field for sanctions in the Register, it should have been clearly noted by the registrant's name.
- 2.13 The BPC's register does not include details of the qualification required for registration. Since as noted above under Standard 2a the BPC does not set out the level of training required for registration, or any areas of specialist

training such as working with children, information about qualifications depends on the information the registrant has provided on their individual profile.

- 2.14 Some registrants are listed as 'medically qualified'. It is not clear from the BPC's website what this means, and so there is potential for misunderstanding, for example about registrants' ability to diagnose medical conditions. We checked some registrants with this listing against the General Medical Council's (GMC) public register to see if it indicated registration as a doctor. We found some matches with doctors of the same name with a current license to practise, but also some examples where registrants appeared to be registered with the GMC but did not hold a current license to practise; and others where the registrant did not appear to have GMC registration at all. This has potential to further compound misunderstanding arising from the term 'medically qualified'.
- 2.15 21 different specialisms are listed on the BPC's register. These include specialisms such as 'Parent Infant Psychodynamic Psychotherapist'. No information about the different specialisms is available on the BPC's website, and so there is no guidance for the public in choosing a practitioner appropriate to their needs or setting out the standards needed to practise under these titles.
- 2.16 The following minimum requirements do not appear to be met:
- Published process for applications (addressed through Conditions for Standard 2a).
 - Any restrictions on practice are displayed clearly.
- 2.17 To address this, the Panel issued the following Recommendations:
- 2.18 **Recommendation One:** The BPC should have mechanisms in place to make sure that all sanctions are promptly displayed against individual register entries.
- 2.19 **Recommendation Two:** The BPC should provide clear and consistent explanations of the terminology used on its website about the treatments involved and the expertise and qualifications of its registrants, of how far it has verified registrants' entries and definitions of the specialisms listed on its website. This should include clarity about the definition of 'medically qualified'.

Standard 3: Standards for registrants

- 3.1 Overall, the BPC has appropriate standards in place for professional behaviours and business practice.
- 3.2 The BPC's registrants are required to confirm they will comply with its Safeguarding and Equal Opportunities policies during registration. The BPC told us that it is updating its registration form so that it will also directly link to its Code of Ethics from April 2022. We will check this has been completed at our next assessment.
- 3.3 The BPC has CPD requirements to keep registrants up to date in their specialisms and on cross-cutting areas such as data security. It audits 5% of registrants annually to check compliance. Previously, registrants who were

already subject to NHS CPD requirements had been exempt from the BPC's separate requirements, but this will end in April 2022.

- 3.4 The BPC told us it is developing revised ethical standards for registrants. The final version was not yet published at the time of our assessment, but we will check for this at our next assessment. We reviewed a draft version entitled *Standards of Conduct, Performance and Ethics* and saw that this now includes a requirement to comply with the Advertising Standards Authority's CAP Code. Although the BPC has not identified advertising as a particular issue for registrants, this will help make expectations clearer.
- 3.5 In our previous assessment of the BPC, we issued a Recommendation to develop guidelines for its registrants about whistleblowing and the professional Duty of Candour. The BPC published guidance in October 2021⁶ setting out what the Duty of Candour is, and how it relates to the BPC's Code of Ethics. The guidance also refers to whistleblowing, setting out different routes that a registrant could consider raising the concern including with the BPC's Ethics Committee or their MI. We welcome these steps and will check for further developments in the revised *Standards of Conduct, Performance and Ethics* guidance once published.
- 3.6 The BPC does not request direct evidence of indemnity cover at the point of application, registration or renewal, or other monitoring. It asks registrants to declare they have appropriate arrangements in place. We issued the following Recommendation aimed at further mitigating the risks of registrants not having appropriate indemnity cover:
- 3.7 **Recommendation Three:** The BPC should consider further checks to assure registrants hold appropriate indemnity cover, for example as part of its CPD audits.

Standard 4: Education and training

- 4.1 The BPC accredits the training delivered by its Member Institutions (MIs). Practitioners must successfully complete an accredited training course with a MI or be determined by the MI to have demonstrated equivalence, to register with the BPC. The MI then sends them an application form for registration with the BPC, which covers broader requirements such as asking for declarations that the registrant will abide by its Codes and Terms of Conditions. The BPC's Registration Committee reaccredits MI training every five years, and an External Examiner conducts an annual quality assurance check.
- 4.2 There is little published information on the BPC's website about its education and training standards currently. This makes it difficult to identify information such as the level of qualifications required by the BPC for registration through its MIs. The BPC is bringing together its requirements on training standards for MIs, into a single 'MI handbook'. At the time of our assessment this was in development, but we reviewed an example of the BPC's education standards in its draft *Assessment and accreditation criteria for Psychoanalytic psychotherapy, psychoanalytic and Jungian analytic (PA)*. This document sets

⁶ <https://www.bpc.org.uk/professionals/registrants/duty-of-candour/>

out information such as the expected duration of training, and requirements for supervision.

- 4.3 The BPC is also in the process of developing training criteria for the different specialisms. At the time of our review, criteria for only one specialism, adult psychodynamic psychotherapy, was available.
- 4.4 We also reviewed BPC's Practice and Theory Requirements for the BPC Accredited Training Courses which sets out the general competencies, and competencies specific to relevant specialism, that MIs must provide.
- 4.5 Although these documents provide information about some of the BPC's specialisms, there are significant gaps in the overall education and training framework currently. We recognise that the BPC is currently working on further documents which should make its education and training requirements clearer, and that its involvement with the Scope of Practice and Education (SCoPEd) project⁷ means that it is working with other Accredited Registers in this area. However, we think that it is important that there is clear, published information about current education and training requirements, in the meantime to any further developments.
- 4.6 The following minimum requirements do not appear to be met:
- 4.7 Minimum information provided to the public specifies:
 - Type and level of qualification required for entry to the register, including typical duration if is not a standard qualification such as degree
 - If equivalence routes exist, how experience will be considered
- 4.8 We issued a Condition within Standard Two for the BPC to set out its current education and training requirements, as part of its routes to registration, within six months. Additionally, the Panel issued the following Condition on education and training aimed at publishing more substantive information:
- 4.9 **Condition Three:** Publish clear information about the education and training outcomes needed for registration with BPC within 18 months. This should set out the standards of education and training that its Member Institutions are required to deliver for their specialisms to be accredited by the BPC. This should be used to underpin decisions by a MI that a registrant has met the requisite standards for registration with the BPC, whether through its training or demonstrating equivalence.

Standard 5: Complaints and concerns about registrants

- 5.1 At our last review in in February 2021⁸, we issued the following Conditions:
 1. The 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.

⁷ <https://www.bpc.org.uk/training/scoped/>

⁸ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/panel-decisions/annual-review-panel-decision-bpc-2020.pdf?sfvrsn=dc657120_18

2. The 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.
 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.
- 5.2 The BPC published revised complaints processes in January 2022⁹. We reviewed these and found that overall, the Conditions had been satisfied as set out in further detail below.
- 5.3 The first Condition has been met through updates to the BPC's webpages. Its homepage now makes clearer that it is responsible for setting the standards required of the profession and considering concerns raised against its registrants. The homepage links directly to the Concerns section of its website, where more information about how to submit a complaint is provided. The header and footers of the website also provides a direct link to information about raising concerns.
- 5.4 This means that information about how to raise a concern is clearer from the main pages of the BPC's website. We suggest this could be further improved and issued a Recommendation:
- 5.5 **Recommendation Four:** The BPC should provide direct links to its Ethical Framework (or updated version once published), within its information about how to raise concerns.
- 5.6 For the second Condition, we reviewed examples of complaints considered through its PRP route since implementation. The BPC provided comparison data for the number of complaints handled through the PRP, Fitness to Practise (FtP) hearings and those that have been dismissed by the Screening Committee (SC) since 2015 (of 38 complaints received 25 were dismissed, six referred to the PRP and seven to FtP Hearing). We did not review these in detail, because the BPC's complaints process has since been revised. We will do an audit of cases at its next assessment.
- 5.7 We checked that cases that should result in a published sanction could be found on the BPC's Complaint Decisions webpage¹⁰. We noted that the BPC appears to receive relatively few complaints - less than 10 complaints per year for a registrant base of approximately 1800. Although we determined the

⁹ See: <https://www.bpc.org.uk/regulation/fitness-to-practise-documents/>

¹⁰ See: <https://www.bpc.org.uk/regulation/complaints-decisions/>

Condition has been met, we will monitor the volume of complaints and how the processes are working in practice.

- 5.8 The third Condition from the last review was the most substantive and required the BPC to review its complaints processes. The BPC has made significant changes to its complaints processes over the past year. The revised approach includes the following key changes:
- Introduction of Acceptance Criteria which sets out the threshold for investigation by the BPC;
 - A simpler 'Realistic Prospect' test used by the Screening Committee when deciding whether to take forward a complaint;
 - Closure of the PRP process, instead enabling the Screening Committee to issue Letters of Advice and Warnings;
 - New criteria to set out when a decision by the Screening Committee can be reviewed;
 - Where facts and impairment are agreed by the Registrant, a case can be decided by a Panel on papers without the need for a hearing ('Agreed Panel Disposal').
- 5.9 All concerns received by the BPC will be triaged against its Acceptance Criteria to determine whether an investigation should take place. This decision is made by the BPC's Head of Regulation, in consultation with the Head of Professional Practice.
- 5.10 If necessary, the complaint may be referred to the Interim Orders Committee (IOC) at this time. If a referral is made to the IOC then complainants may request an independent review of the decision. There is new guidance to support decisions made by the IOC. Any Interim Measures applied are published on the BPC webpages, although the new Condition 3 (Standard Four) requires that they are also published next to the practitioner's entry on the published register for transparency.
- 5.11 Complaints that meet the Acceptance Criteria, and are not referred to an IOC, will be considered by the Screening Committee, who apply a 'realistic prospect test' to establish whether there is potential for the registrant's practice being found impaired. Grounds for impairment include: professional misconduct, deficient professional performance, adverse physical or mental health, adverse determinations by another regulatory or professional body, or a criminal conviction or caution.
- 5.12 The Screening Committee can decide to adjourn the case, close it with no further action, close the case and issue a Letter of Advice to the registrant, issue a Warning to the registrant, or refer the case to a Fitness to Practise Hearing.
- 5.13 Previously, responsibility for presenting concerns about a registrant rested with the complainant. Within its new processes, it is clearer that accountability for determining whether its Codes have been met rests with the BPC, rather than the complainant. Complainants may still participate where appropriate, for example as a witness if the concern progresses to a Fitness to Practise Hearing. However, allegations are now presented by a Legal Adviser, and the

complainant is not required to present or question the Registrant. The BPC has produced *Guidance for Witnesses*¹¹, published in January 2022. Both the complainant and the BPC may request a review of a decision by the BPC's Screening Committee not to refer to a Hearing, on grounds defined within the Decision Review process.

- 5.14 The revised guidance includes mechanisms to encourage consistency of outcomes such as the *Indicative Sanctions Guidance*, *Screening Committee Guidance* and *Warnings Policy and Guidance*. It has not to date undertaken scrutiny of complaints handling through audit or similar, apart from the routes available to request reviews of individual decisions. The BPC reviews complaints on an annual basis to identify common themes, and reports findings to its Board and Ethics Committee.
- 5.15 The BPC told us that it plans to write to all of its registrants to notify them of the revised Fitness to Practise procedures. It plans to undertake further consultation on its approach to public hearings in late 2022. In the meantime, hearings will continue in private.
- 5.16 Overall, the BPC's new procedures go beyond the requirements of our Condition to review complaints processes and provide a plan of action. Its new guidance addresses the areas we had highlighted at our last review. We welcome the substantial amount of work the BPC has undertaken in this time and think that its new processes set out clearer arrangements for how complaints are considered.
- 5.17 **Recommendation Five:** The BPC should further strengthen its approach by undertaking its own scrutiny of a sample of decisions made under its new processes.
- 5.18 We will ask the BPC to report at its next assessment on progress with implementing its new complaints processes. We will undertake our own check on how cases are handled.

Standard 6: Governance

- 6.1 The BPC is a registered charity (Charity Commission number 1185487) and Private Limited Company by guarantee. It is funded through fees from registrants and its Member Institutions. We reviewed records from Companies House and the Charity Commission and noted that the BPC is up to date with filing records.
- 6.2 At our last assessment, we issued a Recommendation for the BPC to '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'. We noted that the BPC now publishes summaries of the minutes of its Board meetings, on its Governance webpage¹². The summaries we reviewed from November and December 2021 included information relevant to its public protection and registration functions.

¹¹ <https://www.bpc.org.uk/download/5042/Guidance-for-Witnesses.pdf>

¹² <https://www.bpc.org.uk/about-us/our-governance/>

- 6.3 The BPC told us that its Terms of Reference for its Committees are still in draft in some areas. It intends to update its Terms for the Registration Committee to reflect the inclusion of one lay member. We think it would be beneficial for the BPC to consider lay participation in other aspects of its work, for example through its Ethics Committee. Although the BPC told us that the Ethics Committee's work focuses on discussion of ethical issues arising during professional practice, noted decisions made by this Committee will affect patients and service users. Consequently, the Panel issued the following Recommendation:
- 6.4 **Recommendation Six:** The BPC should consider how to ensure that the perspectives of patient, service user and lay people inform the work of the Ethics Committee.

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

- 7.1 We found the BPC to have appropriate systems for managing risk overall. The BPC's risk matrix is reviewed quarterly by its Board. Risks it is actively managing include safeguarding, risk of false memories, and the Covid-19 pandemic. We tested some of the mitigations to these risks through assessment, such as its safeguarding policies.
- 7.2 We looked at how the BPC's website communicates the risks and benefits of the services offered by registrants. The distinctions between different modalities, and the limitations of these approaches, did not appear clear to us. However, the BPC does publish information about why people seek therapy¹³ and what people can expect from a therapy session¹⁴. We note the BPC's comments that the limitations of psychotherapy will be subjective, and will seek to gain a clearer understanding of the benefits and limitations of the different modalities practised through our assessment of Standard 1 later in 2022.
- 7.3 We also asked about how the BPC ensures its registrants are trained to support people at risk of suicide or self-harm as this is a risk theme we are currently looking at across all counselling and psychotherapy Registers.
- 7.4 The BPC does not publish its own guidance on working with people at risk of suicide or self-harm but told us that understanding of suicide is already addressed within trainings. We noted that one of the BPC's MIs, as publicised on the BPC's website, held training on 'Working with Suicide' in February 2022 and that this covered areas such as how to assess risk when working with a suicidal client, the implications and issues about breaking confidentiality and will look at any relevant legal issues. Noting that the National Institute for Clinical Excellence (NICE) is currently consulting on a new draft guideline on self-harm¹⁵, we will check once the guideline is finalised what implications the BPC thinks this might have for its MIs and registrants. We will also check that its education and training criteria required for Condition Four includes competencies on working with risk of self-harm and/or suicide.

¹³ <https://www.bpc.org.uk/information-support/what-is-therapy>

¹⁴ <https://www.bpc.org.uk/information-support/what-can-i-expect-from-a-session>

¹⁵ <https://www.nice.org.uk/news/article/self-harm-is-everyone-s-business-nice-says-in-new-draft-guideline>

Standard 8: Communications and engagement

- 8.1 Overall, the BPC provides clear and user-friendly information about itself and its role, targeted at different audiences, on its website. Its homepage clearly states its role of setting standards and links to its published register. Its webpages have been updated to provide clearer information about how to raise a concern about one of its registrants with new guidance about its complaints processes.
- 8.2 However, as noted in relation to Standards Two and Four we think there should be clearer information about the registration processes, and about its education and training requirements.
- 8.3 We also think that the BPC's register could be improved by providing more context for the different types of specialism that can be used to search for a Registrant. We could not find corresponding definitions for specialisms listed. For example, search terms include 'Couple psychoanalytic psychotherapist' and 'Couple psychodynamic psychotherapist', whereas elsewhere on the BPC's website it is stated that 'Psychoanalytic and psychodynamic psychotherapy are essentially interchangeable terms'. Without clear information about the specialisms offered by Registers, this could be confusing for people using the Register to find a practitioner.
- 8.4 We note that work to enhance this is likely to be linked to having clearer information about education and training requirements for different specialisms. Completion of Condition Three presents an opportunity to review the information on the BPC's searchable register once education and training requirements are clear, and we will check on progress with this at our next assessment.
- 8.5 We noted that the BPC appears to engage mainly with its MIs when developing its policies and guidance. We think it would be of benefit to broaden this out to other groups. The BPC told us that it is considering how it could achieve broader consultation with groups such as its registrants, other Accredited Regulators, UK government and patient representative bodies. We would welcome this approach and will check with the BPC on progress at its next assessment.
- 8.6 The BPC holds an annual *Psychoanalytic Psychotherapy Now* conference that looks at current issues. Its 2021 conference looked at 'Sexual Diversity and Psychoanalysis: acknowledging the past and looking to the future'. The event sought to 'recognise the past with a statement that regrets the pathological diagnoses of homosexuality and consequent exclusion of LGBT voices and look to the future by bringing together contemporary psychoanalytic thinking on sexual diversity which moved beyond heteronormative assumptions.' A Statement of Regret was also published in November 2021¹⁶. We commend the BPC for seeking to acknowledge and address previous harm and for initiating discussion with registrants on sexual orientation and psychoanalysis.

¹⁶ <https://www.bpc.org.uk/ppnow-2021-homosexuality-statement-of-regret/>

Share Your Experience

- 9.1 We received four concerns through the SYE since the previous annual review of accreditation in February 2021. Some of these related to complaints and were considered as part of our review of the BPC's new processes.

Impact assessment (including Equalities Duty)

- 10.1 We considered the impact of our decision to renew accreditation of the BPC, with Conditions. We did not identify any adverse impacts and think that the Conditions will help to ensure greater transparency of information about registration, education and training requirements for registrants and members of the public. In recognition that the BPC is a relatively small organisation, we have aimed to allow enough time for it to meet the more substantive Conditions.
- 10.2 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 the BPC's work or our decision to renew accreditation. We welcome the BPC's engagement with discussion on sexual orientation and psychoanalysis and its Statement of Regret as discussed at paragraph 8.6.