

Annual review of accreditation 2020/21

UK Association for Humanistic Psychology
Practitioners (UKAHPP)

September 2020

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About UK Association for Humanistic Psychology Practitioners

The UK Association for Humanistic Psychology Practitioners (UKAHPP) registers:

- Counsellors
- Psychotherapists

Its work includes:

- Setting and maintaining standards of practice and conduct
- Maintaining a register of qualified professionals
- Assuring the quality of education and training
- Requiring registrants to keep their skills up to date through continuing professional development
- Handling complaints and concerns raised against registrants and issuing sanctions where appropriate.

As of May 2020, there were 138 registrants on UKAHPP's register.

UKAHPP was first accredited on 7 June 2018. This is its Second annual review and this report covers 7 June 2019 to 7 June 2020.

Background

The Professional Standards Authority accredits registers of people working in a variety of health and social care occupations not regulated by law. To be accredited, organisations holding such registers must prove that they meet our demanding [Standards for Accredited Registers](#) (the Standards). Accreditation is reviewed every 12 months.

Accreditation can be renewed by a Moderator in cases where all Standards are evidenced to be met. A Moderator can issue Recommendations and note Achievements.

Where concerns do exist, or information is not clear, a targeted review will be initiated by a Moderator. The outcome of this review is assessed by an Accreditation Panel, who can decide to renew accreditation, renew accreditation with conditions, suspend accreditation or remove accreditation. Panels may also issue Recommendations and note Achievements.

- **Condition** – Changes that must be made within a specified timeframe to maintain accreditation
- **Recommendation** – Actions that would improve practice and benefit the operation of the register, but do not need to be completed for compliance with the Standards to be maintained. Implementation of recommendations will be reviewed at annual renewal
- **Achievement** – Areas where a register has demonstrated a positive impact on one of the four pillars of the programme; protection, choice, confidence and quality.

Outcome

Accreditation for UKAHPP was renewed with a condition for the period of 7 August 2020 to 7 August 2021.

Accreditation was renewed by a Panel following a review of evidence gathered by the Accreditation team and supplied by UKAHPP. The Moderator requested that a targeted review be carried out on Standards 4, 9 and 10 and noted that all other Standards were considered as met.

The following Condition was issued to be implemented by the timeframe specified:

1. UKAHPP must provide an update on its financial sustainability after six months. (Paragraphs 4.1 to 4.6)

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

1. UKAHPP should update its risk register to include risks associated with the COVID-19 pandemic. (Paragraphs 3.5 to 3.8)
2. UKAHPP should continue to explore options for engaging service users in what it does. (Paragraphs 7.1 to 7.4)
3. UKAHPP should make trainee/student grades of membership and their remit (i.e. scope of practice) clear to the public. The organisation should make clear the distinction between registrant status and other grades of membership and put measures in place to monitor its registrants use of the accreditation mark. (Paragraphs 9.1 to 9.4)
4. UKAHPP should consider ways in which it can raise awareness with the counselling agencies about UKAHPP and its role in registering practitioners and handling complaints. (Paragraphs 10.5 to 10.14)

The following report provides detail supporting the outcome.

Assessment against the Standards for Accredited Registers

Standard 1: the organisation holds a voluntary register of people in health and/or social care occupations

- 1.1 There were no significant changes reported or noted in the past year.
- 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 There were no significant changes reported or noted in the past year.
- 2.2 The Authority found that this Standard continues to be met.

Standard 3: risk management

- 3.1 The Authority compared the risk matrix received as part of last year's annual review. The Authority noted that UKAHPP had added a risk associated with adjunctive therapies as discussed below. The Authority also noted that some of the risks descriptions and mitigations have been updated. There were no changes to the risk scores.
- 3.2 Last year the Authority considered how Accredited Registers approach 'adjunctive therapies': these are practices performed by registrants in the course of their work that are outside the explicit scope of their practice or competence. These practices may be directly related to the register's modalities for example a counsellor offering hypnotherapy or completely unrelated such as a counsellor offering complementary therapies. UKAHPP confirmed that it does not endorse the practice of procedures that are not within the scope of a registrant's scope of practice. This is covered within section 2 of the *Code of Practice and Ethical Principles*. UKAHPP noted that any concerns raised about a registrant's practice of an adjunctive therapy would be considered through UKAHPP's Complaints Procedure. The Authority noted that the practice of adjunctive therapies was not included within UKAHPP's risk matrix and decided to issue a Recommendation for UKAHPP to consider adding adjunctive therapies to its risk matrix.
- 3.3 The Authority reviewed UKAHPP's risk matrix and noted that it had added adjunctive therapies as a separate risk to its matrix. UKAHPP highlight several controls including its *Code of Practice and Ethical Principles*, its training and education requirements, its supervision policy and its annual quality assurance checks. The Authority found that the Recommendation had been considered.
- 3.4 The Authority has asked Accredited Registers what actions they have taken in response to the COVID-19 epidemic. UKAHPP reported that it issued guidance to its registrants at the beginning of the crisis. UKAHPP's letter to its registrants provides some guidance about offering online and telephone therapy. UKAHPP provided additional guidance to its registrants about working online. This guidance advises that registrants must check their

indemnity cover and ensure confidentiality and data protection requirements are being met. The guidance looks at what to do if either the therapist or the client becomes ill with COVID-19 and what to do if online therapy does not work.

- 3.5 The Authority noted that UKAHPP has updated its risk description and mitigation relating to remote therapy (Risk 26) in line with its guidance about COVID-19 but it has not added a specific 'epidemic' risk to its register. UKAHPP has highlighted potential risks associated with members returning to face to face work prematurely and notes that it has issued further guidance about this. The Authority noted the updated risk matrix, however considered that it was important for registers to understand the wider risks associated with the pandemic. In line with other registers, the Authority decided to issue a Recommendation: UKAHPP should consider updating its risk register to include risks associated with the COVID-19 pandemic. (Recommendation 1)
- 3.6 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 UKAHPP highlighted the potential financial impact that the current COVID-19 crisis could have on UKAHPP's financial sustainability. UKAHPP noted that many of its registrants are close to retirement and some may choose to retire early rather than make changes to the way they practise by for example offering online therapy. UKAHPP also noted that some of its registrants may have had reduced income due to the crisis which may impact on their ability to pay their registration and accreditation costs. This could then have an impact on UKAHPP.
- 4.2 The Authority noted that UKAHPP has worked over the past year to increase its membership. This has included migrating registrants from another organisation to the UKAHPP register, reviewing and updating its registration criteria (see Standard 10) and trying to attract students who will later be eligible for full registration (see Standard 9). The Authority also noted that UKAHPP has Trustee Liability Insurance which covers UKAHPP and its officers in case of legal challenge following a disciplinary procedure.
- 4.3 As part of its due diligence, the Authority reviewed records from Companies House to year end December 2018 and information supplied by UKAHPP. The Authority noted the savings that had been made this year and the increased income from the transfer of registrants. The Panel noted that UKAHPP appeared to be currently financially sustainable but was concerned about the potential impact of a complaint on UKAHPP's resources. The Panel decided to issue a Condition: UKAHPP must provide an update on its financial sustainability after six months. (Condition 1)
- 4.4 The Authority found that this Standard was met with a Condition.

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

- 5.1 There were no significant changes reported or noted in the past year.
- 5.2 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 At UKAHPP's initial accreditation, the Authority issued the following Learning Point: UKAHPP should consider continuing to explore options for engaging service users in what it does. At last year's annual review, UKAHPP reported that it does not have direct contact with members of the public who access the services of its registrants but that it will continue to explore options for drawing on the input of service users for future developments. The Authority considered UKAHPP's response to the Learning Point and considered its plans to consult an expert about its website and the potential use of social media. In line with previous decisions, the Authority decided to issue a Recommendation that UKAHPP should consider continuing to explore options for engaging service users in what it does.
- 7.2 One of the ways this can be done is through lay involvement on the Board. The current Board consists of seven members, one of which is lay. UKAHPP reported that there are concerns about individual disclosures and potential boundary issues if clients of UKAHPP registrants were invited to be on the Board. UKAHPP noted that it has decided to invite a patient representative from a mental health consumer group to sit on its Board. However, it notes that the Board is 'predominantly concerned with internal governance rather than the wider context of mental health services which would be the purpose of involving a consumer agency. The Board will keep this issue under review and hopes to be in a position to implement this decision within the next year.'
- 7.3 The team asked UKAHPP to clarify what is meant by the Board being 'predominantly concerned with internal governance rather than the wider context of mental health services' and how UKAHPP assures itself that it is taking adequate account of the external environment in making decisions about the registers. UKAHPP responded:

'Inviting a representative of a service user agency is seen as an alternative to the requirement to involve service users which is not possible for UKAHPP. At UKAHPP's present stage of development, internal governance issues take up nearly all of the Board's time and it is felt that the time is not right to actively seek a representative from a mental health service user agency until it has the capacity to focus more on the wider political and campaigning issues relating to mental health services.'

The Board is nevertheless committed to the principle of increasing lay involvement in UKAHPP governance and always seeks opportunities to recruit appropriate lay members.

The Board and UKAHPP Registrants generally are acutely aware of current issues affecting the wider profession which have a profound effect on their professional lives. A UKAHPP Board member is a part of the professional group that is currently negotiating with NICE on the research issues that are central to the reasons for the limited availability of psychotherapy in statutory services.'

- 7.4 The Authority considered the work that UKAHPP had carried out in this area but also that the lay representation on the Board had decreased due to the resignation of the Ethics Committee Chair. The Authority noted UKAHPP's plans but decided to re-issue the Recommendation: UKAHPP should continue to explore options for engaging service users in what it does. (Recommendation 2)
- 7.5 One of the Committees reporting to the Board is the Ethics Committee, responsible for handling complaints. The Chair of the Ethics Committee was lay but has now left this role. UKAHPP is currently seeking a lay person for this role, however in the meantime the interim Chair of the Ethics Committee has been appointed, they are a professional member of the Board. UKAHPP's handling of complaints is discussed under Standard 11.
- 7.6 At last year's annual review, UKAHPP indicated that it was planning to update its website to make it more public focussed. UKAHPP provided an update on this project and noted that UKAHPP 'needs a modern website which is more public facing and serves to promote the organisation, the profession and the humanistic therapeutic tradition as well as meeting the needs of the Register.' However, the project has been put on hold and will continue when resources allow.
- 7.7 The Authority found that this Standard continued to be met.

Standard 8: setting standards for registrants

- 8.1 There were no significant changes reported or noted in the past year.
- 8.2 Last year the Authority considered how Accredited Registers approach whistleblowing and the professional Duty of Candour. UKAHPP confirmed that it did not have guidance for its registrants on whistleblowing or the professional Duty of Candour. In line with previous decisions, the Authority issued a Recommendation that UKAHPP should consider developing guidelines for whistleblowing and Duty of Candour for its registrants.
- 8.3 UKAHPP developed a whistleblowing policy and has added standards relating to the professional Duty of Candour to its *Code of Practice and Ethical Principles* (see paragraph 4.7). This states that registrants have 'an obligation to be open and honest with clients when something happens in their psychotherapy or counselling which causes, or has the potential to cause, harm or distress. It is a requirement that aims to promote public trust and confidence in the profession by requiring registrants to be honest and trustworthy when things go wrong.'

- 8.4 UKAHPP's [whistleblowing policy](#) describes the types of concerns that can be raised, provides details of confidentiality and anonymity and the process by which someone can raise a whistleblowing concern about UKAHPP.
- 8.5 The Authority found that the Recommendation had been considered.
- 8.6 At last year's annual review, UKAHPP reported that it would be looking at the development of guidance for online and telephone therapy. This has become particularly relevant given the changes to practise caused by the COVID-19 crisis. UKAHPP stated that 'UKAHPP believes that its Registrants are sufficiently well trained and experienced to adapt to therapeutic relational differences associated with remote modes of working without the need for further therapeutic qualification.'
- 8.7 UKAHPP developed guidance for its registrants, this is discussed under Standard 3. It has also added a section to its [Code of Practice and Ethical Principals](#), paragraph 3.7 Remote Therapy Practice Requirements. This section notes that online and telephone therapy is supplementary to face to face therapy so a registrant's training must have been based on face to face work with clients. UKAHPP does not endorse text or email-based therapy. UKAHPP notes that 'registrants must ensure that they have sufficient knowledge and understanding of the technical issues and legalities and potential relational adjustments needed for safe remote practice.'
- 8.8 The Authority found that this Standard continues to be met.

Standard 9: education and training

- 9.1 UKAHPP reported that it had been in discussions with Edgehill University in relation to the MSc in Psychotherapy & Counselling: Contemporary Creative Approaches course. UKAHPP noted that all students on this course are required to work in accordance with UKAHPP's *Code of Practice and Ethical Principles*. Students will be registered with UKAHPP and encouraged to join the UKAHPP register on completion of the course.
- 9.2 UKAHPP has confirmed that student members will not be part of the published register but will appear in an appendix to the register. UKAHPP reported that an explanatory statement will be included. UKAHPP reported that training institutions will provide a list of names to UKAHPP for inclusion onto its register and pay a nominal administration fee per trainee. UKAHPP confirmed that trainees/students can opt out of registration.
- 9.3 The Authority asked UKAHPP if it had carried out any assessment of the course. UKAHPP reported that it had 'provided representation on the University Course Development Team from the onset to ensure that structure of the course was designed in alignment with UKAHPP Accreditation Criteria. Successful completion of all aspects of the course provides eligibility for the UKAHPP Register. A member of the UKAHPP Accreditation Committee will remain on the University's Course Management Team to ensure that changes to UKAHPP Accreditation and Registration requirements are incorporated within the course programme.'
- 9.4 The Authority considered the information provided by UKAHPP about their course and noted that this appears to be in line with the wording of Standard 9d in terms of accepting courses that meet the educational standards, given

the course was developed in line with the UKAHPP's requirements. The Authority noted that the student register will not form part of the accredited register and therefore does not fall within the Authority's remit. However, the Authority recognises that the information UKAHPP provides to the public should be clear and so decided to issue a Recommendation: UKAHPP should make trainee/student grades of membership and their remit (i.e. scope of practice) clear to the public. The organisation should make clear the distinction between registrant status and other grades of membership and put measures in place to monitor its registrants use of the accreditation mark. (Recommendation 3)

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

Standard 10: management of the register

- 10.1 The Authority noted that UKAHPP did not appear to differentiate between spent and unspent convictions in its declarations. UKAHPP reported that the rationale for not differentiating was that 'an offence maybe in a category for becoming spent but still might [be] considered prejudicial to fitness practice as a counsellor or psychotherapist' however it recognises that 'current legislation prevents the holding and processing of any information relating to spent convictions and as a consequence has revised its disclosure statement to disclosure of unspent convictions only.' As a result, UKAHPP has updated its declarations to require declarations of spent convictions only.
- 10.2 UKAHPP's Registrar carries out an annual audit of 10% of its registrants' continuing professional development (CPD), supervision and indemnity insurance. UKAHPP provided an update on its latest audit which was conducted in July 2019. UKAHPP noted that it granted some extensions due to mitigating circumstances. Two registrants did not reply within the required timescales, but subsequently submitted their paperwork. UKAHPP confirmed that all other registrants were compliant with its audit requirements.
- 10.3 UKAHPP reported that it had made minor revisions to its process to ensure that registrants would not be audited in two successive years and that new registrants would not be audited during their first year of registration with UKAHPP. UKAHPP noted that the Registrar can still ask for information from these registrants in year if there are concerns. UKAHPP has also updated its annual declarations to include the requirement for registrants to submit the required information for audit.
- 10.4 UKAHPP reported that it has transferred members from Chiron to the UKAHPP register. UKAHPP confirmed that 59 registrants have now completed the transition to its register. UKAHPP confirmed that the entry level criteria for both registers were in alignment so registrants were moved to UKAHPP's register. UKAHPP's registrar will be carrying out checks on samples of registrants at the point of transfer.
- 10.5 UKAHPP advised that it has revised its accreditation structure to try and expand and diversify its register. The revised structure includes:
 - 1) An entry level category - this is a new category for trainees who can practice under supervision and are working towards the required academic standard for registered membership.

- 2) Ordinary Registered membership - this is an existing category for entry to the register which is set at QAA level 5 or equivalent
 - 3) An Accredited Registered membership - a new category for those with Level 5 QAA or equivalent or above with a minimum two years post qualifying experience and 450 hours supervised practice.
 - 4) Higher Accredited Registered membership - this is the original accredited registered membership.
- 10.6 UKAHPP confirmed that the entry level will be included on the register, registrants at this level can practice 'under the auspices of an agency which provides supervision,' individual private practice is not allowed under this category.
- 10.7 The Moderator considered the information provided in the report and that which is on UKAHPP's website. The Moderator found that the information about registration/membership grades on the website was across at least three pages and that the types of registration available did not match the membership categories used on the register. The Moderator noted that as a result the membership categories are not very clear and that this could make it difficult for a member of the public to make an informed decision about their care. From the information provided, the Moderator was not clear whether there had been a change in the entry level for the Accredited Register, if so this may need to be considered through the notification of change process to ensure that stakeholders had been given the opportunity to comment. The Moderator also noted that there appeared to be confusion between student membership and the new entry level category. The Moderator therefore requested a targeted review be carried out.
- 10.8 UKAHPP confirmed that it had made changes to the entry level for its register. Previously, the Ordinary Registered member was the entry level, this required a QAA level 5 qualification with 450 tutor contact hours, 100 practice hours and 30 hours of personal therapy. The new Entry Level membership requires a QAA level 4 qualification (this is equivalent to the National Counselling Society) with at least 100 supervised practice hours and 400 tutor contact hours and 30 hours of personal therapy.
- 10.9 UKAHPP reported that it had made the changes to offer registrants an incremental pathway for progression and because they believe that 'it is the public interest to have as many practitioners as possible on an accredited or statutory register, where they can be monitored rather than be in unregulated practice.' UKAHPP hope that the changes will also attract new members and lead to increased diversity on its register.
- 10.10 UKAHPP's website states that registrants in this category will be encouraged to attain Ordinary Registered Membership or Accredited Registered Membership. UKAHPP also states that registrants within this category are not endorsed to work within private practice and will not be included in the UKAHPP's Find a Therapist facility. UKAHPP has not made any changes to its application process.
- 10.11 Registrants at this level will be added to the register and will be subject to UKAHPP complaints process. UKAHPP noted that registrants applying in this category must be working under the auspices of a suitable agency which

provides clinical supervision. UKAHPP noted that it was likely that complaints against Entry Level Registrants will be made to the agency in the first instance. UKAHPP reported that its registrants are obliged through its terms and conditions of membership to report to UKAHPP if they are subject to a complaint. UKAHPP reported that where it became aware of a complaint it would follow its processes which require it to review complaints against its own Codes. In serious cases it would instigate its interim measures processes to control registration until the complaint had been concluded. UKAHPP would review the outcome against its own Codes and if necessary, initiate its complaints process.

- 10.12 UKAHPP confirmed that if a complaint was raised with them directly, they would seek consent to share the content of the complaint with the agency, if not provided, UKAHPP's complaints procedure will be initiated.
- 10.13 UKAHPP has rationalised the information about registration grades on its website. The [registration and application page](#) provides details about UKAHPP's requirements at each level, the [register page](#), provides a brief description of each level and a link to the register. UKAHPP has also updated their register so that it no longer refers to membership category but instead notes the registration level of each registrant.
- 10.14 The Authority noted the information provided by UKAHPP and welcomed the changes UKAHPP had made to the information on its website. The Authority considered how UKAHPP will consider complaints against Entry Level Registrants and note the collaborative approach UKAHPP intends to take. The Authority noted that this approach relies on the UKAHPP being informed of a complaint by the practitioner and found that there was a risk that UKAHPP may not be made aware of ongoing complaints and decided to issue a Recommendation: UKAHPP should consider ways in which it can raise awareness with the counselling agencies about UKAHPP and its role in registering practitioners and handling complaints. (Recommendation 4)
- 10.15 The Authority found that this Standard continues to be met.

Standard 11: complaints and concerns handling

- 11.1 There were no significant changes reported or noted in the past year.
- 11.2 At its initial accreditation, the Authority noted that in the absence of its own document, UKAHPP's Ethics Committee used UKCP and HCPC Indicative Sanctions Guidelines and decided to issue the following Learning Point: UKAHPP should consider developing further guidance to ensure complaints decisions made by its committees/panels are fair and consistent (for example 'indicative sanctions guidelines'). At last year's annual review, UKAHPP reported that it had developed Indicative Sanctions Guidelines which were published on its website.
- 11.3 The Authority reviewed the guidelines and noted that they included information about the types of circumstances in which the different sanctions may be suitable. The guidelines also stated that panels need to consider mitigation and aggravating factors and that any sanctions imposed should be proportionate bearing in mind the public interest. The Authority noted that it was not clear whether UKAHPP would publish outcomes where fitness to

practise had been found to be impaired but where no sanction had been applied, what if anything would be published where undertakings had been agreed and what, if anything would be published where sanctions had been issued for health cases. The Authority stated that it was good practice to publish outcomes that restrict a registrant's practise to enable the public to make informed decisions and decided to issue a Recommendation that UKAHPP should consider having publication guidance for these types of cases, so that it is clear when outcomes should be published.

11.4 At this year's annual review, UKAHPP reported that:

'The Indicative Sanctions Guidelines have been framed to give discretion to a Panel to achieve a good and fair balance between the need for public protection and a proportionate and fair response to a Registrant including consideration of aggravating and mitigating factors. Adjudication Panels are required to consider all options in the order of increasing seriousness, starting with the least restrictive. Written Warnings and Undertakings where practice is not impaired or where practice is impaired, but the Panel is satisfied that there is no risk to the public and the impairments to practice are minor in nature, are less likely to be published. Generally, the imposition of an Improvement Order or Conditions of Practice Order reflects greater seriousness and are more likely to be published although there maybe mitigating factors and an absence of risk that could lead to non- publication. Where practice is impaired owing to the health of the registrant, "a panel may impose specific conditions that are not published, so as to minimise their impact on the registrant" (Indicative Sanctions Guidance 10.11). Publication in these circumstances would depend on the nature of the impairment and whether publication was necessary to ensure public protection.'

11.5 UKAHPP's indicative sanctions guidance is on its [website](#).

11.6 The Authority has previously stated that there are strong public interest reasons for publication of sanctions, particularly if those sanctions arise out of cases involving serious misconduct and were restrictive. The Authority has noted that it is good practice to publish outcomes that restrict a registrant's practise to enable the public to make informed decisions when choosing a practitioner. The team noted that the UKAHPP stated that 'Improvement Order or Conditions of Practice Order reflects greater seriousness and are more likely to be published although there maybe mitigating factors and an absence of risk that could lead to non- publication.' And in relation to health cases 'Where practice is impaired owing to the health of the registrant, "a panel may impose specific conditions that are not published, so as to minimise their impact on the registrant" (Indicative Sanctions Guidance 10.11). Publication in these circumstances would depend on the nature of the impairment and whether publication was necessary to ensure public protection.'

11.7 UKAHPP noted that 'The Indicative Sanctions Guidelines have been framed to give discretion to a Panel to achieve a good and fair balance between the need for public protection and a proportionate and fair response to a Registrant including consideration of aggravating and mitigating factors.' The team asked given the points noted above, how UKAHPP ensures that it has a consistent approach to the application and publication of sanctions.

'In the interest of public protection, the details of all fitness to practice Adjudication and Appeal Panel outcome sanctions, including Suspension, Conditions of Practice and Improvement Orders governing a registrant's practice will be published on UKAHPP's publicly available website. The outcome of such sanctions and Interim Suspension Orders will be published on the UKAHPP Register - as fact only.

However, Adjudication and Appeals Panels may exercise discretion, where there is legitimate mitigation and instruct the UKAHPP to limit the publication of fitness to practice sanctions by redacting certain information. Such mitigation will include the disclosure of personal information such as illness details, personal circumstances where there would be no benefit to public protection by publishing such information and where a registrant's or a third party's data protection rights would be otherwise violated.'

- 11.8 UKAHPP has reported that it will update the appendix Summary of Sanctions and interim Suspension Orders found in the *Indicative Sanctions Guide* to include the above information. The Authority found that the Recommendation had been considered but requested that the UKAHPP provide a copy of the updated document to the team.
- 11.9 UKAHPP reported that it had not received any complaints in the last accreditation year either against registrants or themselves. UKAHPP provided an update on the complaint received last year which was successfully resolved through mediation.
- 11.10 UKAHPP reported that following the resolution of this complaint, it had made a minor update to its [complaints procedure](#) to allow the Ethics Committee more discretion to offer mediation where appropriate and in cases where a case to answer had not been evidenced. The new procedure states:
- 'Where a complaint is not progressed and it is evident that the relationship between the Complainant and the Registrant has suffered damage, the Ethics Committee, with the consent of both parties, may assist them to address their difficulties and help them access mediation. In such cases the mediation will be outside the scope of the Complaints Procedure and the UKAHPP will not be obliged to provide funding.'
- 11.11 The Authority found that this Standard continues to be met.

Share your experience

- 12.1 The Authority did not receive any responses to the invitation to share experience and did not receive any concerns about UKAHPP during the accreditation year.

Impact assessment

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

Equality duty under the Equality Act 2010

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