Accreditation renewal report

Standards 1-8

UK Council for Psychotherapy

13 March 2024



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About accreditation

The Professional Standards Authority (the Authority) accredits registers of people working in a variety of health and social care occupations that are not regulated by law. To become an Accredited Register, organisations holding registers of unregulated health and social care roles must prove that they meet our *Standards for Accredited Registers* (the Standards).

Initial accreditation decisions are made by an Accreditation Panel following an assessment of the organisation against the Standards by the Accreditation team. The Panel decides whether to accredit an organisation or not. The Panel can also decide to accredit with Conditions and provide Recommendations to the organisation.

- Condition Issued when a Panel has determined that a Standard has not been met. A Condition sets out the requirements needed for the Accredited Register to meet the Standards, within a set timeframe. It may also reduce the period of accreditation subject to a review or the Condition being met.
- Recommendation Actions that would improve practice and benefit the operation of the Register, but which is not a current requirement for accreditation to be maintained.

This assessment was carried out against our *Standards for Accredited Registers*¹ ("the Standards") and our minimum requirements for the Standards as set out in our *Evidence framework*². More about how we assess against Standard One can be found in our *Supplementary Guidance for Standard One*³.

We used the following in our assessment of the UKCP:

- Documentary review of evidence supplied by the UKCP and gathered from public sources such as its website
- Due diligence checks
- Share your experience (SYE) responses
- Assessment of UKCP's complaints procedures.

<u>accredited-registers/accredited-registers-supplementary-guidance-for-standard-one.pdf?sfvrsn=3e5f4920_6</u>

¹ <u>https://www.professionalstandards.org.uk/docs/default-source/publications/standards/standards-for-accredited-registers.pdf?sfvrsn=e2577e20_8</u>

https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-evidence-framework-for-standards.pdf?sfvrsn=55f4920_9
 https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-

The Outcome

The Accreditation Panel met on 31 January 2024 to consider UKCP. The Panel was satisfied that the UKCP could meet with Conditions all the Standards for Accredited Registers.

We therefore decided to renew accreditation of the UKCP with Conditions.

We noted the following positive findings:

- The UKCP has developed specific guidance for witnesses. Its complaints processes consider adjustments for vulnerable witnesses.
- There is an Equality, Diversity and Inclusion (EDI) Committee that sets out an EDI Action Plan. The UKCP appears to be actively engaged in promoting EDI in a range of areas, and this will be considered further as part of the upcoming Standard Nine (EDI) assessment.

We issued the following Conditions to be implemented by the deadline given:

Conditions		Deadline
Standard Two	 The UKCP should ensure that its registration criteria are set out clearly within the information that the UKCP, and its OMs publish. This should include information about what applicants can expect from the equivalence route process, and what criteria/guiding principles will underpin decisions. 	Next annual assessment
	 The UKCP should set out a policy specifying the role of the UKCP, and its OMs, in registration appeals. The UKCP should make sure that this information is available to registrants through its own website, and that of its OMs. 	
	 The UKCP should incorporate Unique IDs to its register, so that individuals can be accurately identified. The type of qualification that the individual has completed to gain entry to the Register should also be provided. 	
	 The UKCP should make it clearer for the public to see which registrants are subject to interim suspension. 	

We issued the following Recommendations to be considered by the next review:

Recommendations		
Standard Four	The UKCP should consider how to set out information about education and training routes more clearly for the public.	

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2. The UKCP should formalise its process for ensuring other Accredited Registers are notified of disciplinary outcomes.

About the Register

This section provides an overview of the UKCP and its register.

Name of	UKCP	
Organisation		
Website	https://www.psychotherapy.org.uk/	
Type of	Registered Charity (1058545)	
Organisation	Registered Company (3258939)	
Role(s) covered	Psychotherapists, Psychotherapeutic counsellors	
Number of registrants	8652 as at 1 January 2024.	
Overview of Governance	The UKCP has a Board which is made up of members elected by the UKCP membership and lay members. It has several Committees responsible for overseeing areas such as education and training standards, and complaints about registrants.	
Overview of the aims of the register	 To make sure that high-quality psychotherapy and psychotherapeutic counselling in both private and public sectors is available to everyone, no matter who they are. To protect the public by making sure everyone on the register meets professional standards, and national accreditation requirements. To develop existing external collaborations and actively seek new ones to achieve a more powerful voice to promote psychotherapy and psychotherapeutic counselling. To carry out appropriate research and use findings to promote psychotherapy and psychotherapeutic counselling and inform members' training and development for the benefit of all. 	

Inherent risks of the practice

This section uses the criteria developed as part of the Authority's *Right Touch* Assurance tool⁴ to give an overview of the work of psychotherapists and psychotherapeutic counsellors.

Risk criteria	Psychotherapist and Psychotherapeutic Counsellor
1. Scale of risk associated with psychotherapists and psychotherapeutic counsellors.	a. Psychotherapists and psychotherapeutic counsellors are trained to help people express their thoughts and feelings and explore what comes up when they do. They listen and provide a non-

⁴ https://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/right-touch-assurance---a-methodology-for-assessing-and-assuring-occupational-risk-of-harm91c118f761926971a151ff000072e7a6.pdf?sfvrsn=f537120_14.

- a. What do psychotherapists and psychotherapeutic counsellors do?
- b. How many psychotherapists and psychotherapeutic counsellors are there?
- c. Where do psychotherapists and psychotherapeutic counsellors work?
- d. Size of actual/potential service user group

- judgmental space so they can feel heard and understood.
- b. The total number of psychotherapists and psychotherapeutic counsellors is not known. Psychological Professions Network (2021)⁵ estimates there are approximately 20,000 psychotherapists working in the NHS in England alone. The increase in registrant numbers for the UKCP and other Accredited Registers of psychological professions suggests that the number of people working in these roles is increasing, potentially in relation to growing demand for services.
- c. Psychotherapists and psychotherapeutic counsellors work in a range of settings, including independent practice and the NHS.
- d. It is estimated that 1 in 6 people a week in England experience a common mental health problem (NHS Digital, 2014). Approximately 1 in 4 people within the UK will experience a mental health problem each year⁶. Due to the nature of their work, UKCP registrants could potentially be treating people across any demographic, within the UK.

2. Means of assurance

Practitioners who are not registered with the UKCP can be registered with another Accredited Register, or a non-accredited professional association. However, registration is not essential. Some registrants will be working in managed settings such as the NHS, which provides additional assurance. Those working in independent practice may not have been subject to criminal records, and other preemployment checks.

3. About the sector in which psychotherapists and psychotherapeutic counsellors operate

Registrants may work in independent practice, or be employed within public services such as schools, NHS, local authorities. They may also be employed by other organisations which provide counselling services, such as Employment Assistance Programmes, the armed and police forces, universities, and transport services.

Mental health provision within the NHS is generally provided across three main settings: care in the primary, secondary and community care.

⁵ https://www.ppn.nhs.uk/all-ppn-resources/42-ppn-south-west-workforce-report-final/file

⁶ McManus, S., Meltzer, H., Brugha, T. S., Bebbington, P. E., & Jenkins, R. (2009). Adult psychiatric morbidity in England, 2007: results of a household survey. The NHS Information Centre for health and social care.

A significant number of people access mental health and wellbeing support from private practitioners. In some cases, this may be due to long waiting lists for talking therapies on the NHS, or to access treatment that isn't available through the NHS. People can access services through a referral from an NHS GP, or by searching for an independent provider themselves⁷.

4. Risk perception

- Need for public confidence psychotherapists and psychotherapeutic counsellors?
- Need for assurance for employers or other stakeholders?

Since people seeking services may be experiencing mental health issues or be otherwise vulnerable, it important that members of the public have confidence in the practitioners they choose to deliver therapy. The specific approach of UKCP, which may not always be available as part of mainstream NHS services, makes it important that the public are aware of what to expect from practitioners. Since registrants may be working with children and/or vulnerable adults, it is important that the public can have confidence there are appropriate safeguards in place.

⁷ Private sector mental health support - Mind

Assessment against the Standards

Standard One: Eligibility and 'public interest test'

Summary

We are in the process of assessing all current Accredited Registers against Standard One, which was introduced in July 2021. Decisions about Standard One for current Accredited Registers can be made by the Accreditation Team if no concerns are identified.

We completed our Standard One assessment in January 2024. We found that the UKCP's register falls within the scope of the Accredited Registers programme. We considered that the work of psychotherapists and psychotherapeutic counsellors can be beneficial. We found it is in the public interest to have registers of practitioners who meet appropriate standards of competence, conduct, and business practice, as required by the UKCP.

Consequently, the Accreditation Team found that Standard One was met. We did not identify any new information that could affect Standard One being met, during the assessment of Standards Two to Eight.

Standard 2: Management of the register

Summary

The Accreditation Panel found that Standard Two was met. It issued the following Conditions:

- Condition One: The UKCP should ensure that its registration criteria
 are set out clearly within the information that the UKCP, and its OMs
 publish. This should include information about what applicants can
 expect from the equivalence route process, and what criteria/guiding
 principles will underpin decisions.
- Condition Two: The UKCP should set out a policy specifying the role
 of the UKCP, and its OMs, in registration appeals. The UKCP should
 make sure that this information is available to registrants through its
 own website, and that of its OMs.
- Condition Three: The UKCP should incorporate Unique IDs to its register, so that individuals can be accurately identified. The type of qualification that the individual has completed to gain entry to the Register should also be provided.
- Condition Four: The UKCP should make it clearer for the public to see which registrants are subject to interim suspension.

Accreditation Panel findings

The main route of entry to the UKCP's register is through training with one of its Organisational Members (OMs). The UKCP undertakes quality assurance on each

OM once every five years to ensure their application processes remain robust and takes overall responsibility for registration decisions. People can also apply directly to the UKCP, after a period of registration with an OM. This allows for people who have not trained through the OM, to be considered for registration dependent on their equivalent training and experience.

We checked the website of the UKCP, and a sample of its OM's websites, to see if registration criteria were set out in a clear and consistent way. We found that information was not always easily accessible, and not in a common format. The Accreditation Panel determined that it would be beneficial for applicants, and members of the public to have clearer information about how the UKCP ensures consistency of registration criteria across its OMs. We issued the following Condition to address this:

Condition One: The UKCP should ensure that its registration criteria
are set out clearly within the information that the UKCP, and its OMs
publish. This should include information about what applicants can
expect from the equivalence route process, and what criteria/guiding
principles will underpin decisions.

If an applicant for UKCP registration made through an OM is unsuccessful, they may appeal to the relevant OM. The appeals policies for each OM appear to vary, although the UKCP told us that all are based on common principles and that decisions can be escalated to the UKCP's Registrar if they cannot be resolved satisfactorily through the OM. People applying through the direct route can appeal to the UKCP through its organisational Complaints Process⁸.

We found that the current approach could lead to inconsistency in decision-making about appeals. The circumstances in which an appeal would be escalated to the UKCP from an OM, and whether this is an option open to applicants, was not clear. The UKCP's organisational Complaints Process does not make specific reference to appeals, and so it is not clear how they would be handled and how decision making is overseen within UKCP. We issued the following Condition to address this:

Condition Two: The UKCP should set out a policy specifying the role
of the UKCP, and its OMs, in registration appeals. The UKCP should
make sure that this information is available to registrants through its
own website, and that of its OMs.

The information provided on the UKCP's Register broadly meets our requirements. However, unique IDs (UIDs), which are a minimum requirement for Standard Two, are not provided. The UKCP told us it is considering introducing UIDs when it reviews its website later in 2024. Given the high number of people on the UKCP's Register and the potential this brings for confusion about similar names, we issued the following Condition:

 Condition Three: The UKCP should incorporate Unique IDs to its register, so that individuals can be accurately identified. The type of

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⁸ Make a complaint about UKCP | UKCP (psychotherapy.org.uk)

qualification that the individual has completed to gain entry to the Register should also be provided.

We checked the Register entry for a registrant who is currently under interim suspension. The registrant could not be found on the register. Information provided on the webpage advised that 'if a therapist is not on our register it may be because: they have not applied to be on our register, they have resigned their UKCP membership or we have removed them from our register (check our Complaints Decisions page for more information)'.

The Accreditation Panel considered this might not be clear enough to a member of the public that someone is under interim suspension if searching by the Register alone. The UKCP could takes steps to make this clearer, such as adding a direct hyperlink to the 'Complaints Decisions' page or listing interim suspension next to the registrants' register entry. We issued the following Condition:

 Condition Four: The UKCP should make it clearer for the public to see which registrants are subject to interim suspension.

Standard 3: Standards for registrants

Summary

The Accreditation Panel found that Standard Three was met.

Accreditation Panel findings

The UKCP's Code of Ethics and Professional Practice⁹ sets out expectations for registrants in areas such as professionalism; communication and consent; records and confidentiality; professional knowledge, skills and experience; social responsibility; and trust and confidence. The UKCP has published separate guidance¹⁰ on how the principles of the Duty of Candour underpins specific areas of this Code.

Registrants are required to confirm they will abide by the Code at initial registration, and that they have appropriate professional indemnity insurance, at annual renewal; in addition to the UKCP's other terms and conditions of membership.

In November 2023, the UKCP published *Guidance regarding gender critical views*¹¹. This provides a statement on the law regarding gender-critical views and its implications for the practice of psychotherapy and psychotherapeutic counselling and is intended as a guide for registrants. The guidance states that 'this statement is also being made to highlight the fact that exploratory therapy must not be conflated with conversion therapy.' The UKCP's Code of Ethics and Professional Practice makes clear that registrants must not practise conversion therapy. We will be considering the UKCP's guidance through our separate assessment of our new Standard Nine (Equality, Diversity and Inclusion), by July 2024.

⁹ https://www.psychotherapy.org.uk/media/bkjdm33f/ukcp-code-of-ethics-and-professional-practice-2019.pdf

¹⁰ https://www.psychotherapy.org.uk/ukcp-members/complaints/learning-from-complaints/accountability-and-duty-of-candour/

¹¹ https://www.psychotherapy.org.uk/news/ukcp-guidance-regarding-gender-critical-views/

We also checked that the UKCP has appropriate safeguarding policies in place. We also saw examples of where UKCP provides additional learning for areas such as data and confidentiality, and learning from complaints, through webinars and other events for registrants.

National Institute for Health and Care Excellence (NICE) publishes evidence-based recommendations for the health and social care sector within England and Wales, developed by independent committees, including professionals and lay members, and consulted on by stakeholders. NICE guidance is relevant for people working both in the NHS, and the independent sectors. In September 2022, NICE published *Self-harm:* assessment, management and preventing recurrence (NG 225) ¹².

NG225 covers assessment, management and preventing recurrence for children, young people and adults who have self-harmed. It includes several 'do not use' guidelines for risk assessment tools and scales, including:

- '1.6.1 Do not use risk assessment tools and scales to predict future suicide or repetition of self-harm.
- 1.6.3 Do not use global risk stratification into low, medium or high risk to predict future suicide or repetition of self-harm.'

At the time of the assessment, we were working with NHS England to identify the extent to which Accredited Registers are implementing NG 225 within their guidance for registrants, and education and requirements. Discussions with the UKCP on this issue are ongoing. If we identify the need for further actions in the meantime to the UCKP's next assessment, these will be addressed through a Targeted Review¹³.

Standard 4: Education and training

The Accreditation Panel found that Standard Four was met. It issued the following Recommendation:

 Recommendation One: The UKCP should consider how to set out information about education and training routes more clearly for the public.

Accreditation Panel findings

The UKCP has a process for the assessing applications from organisations that provide education and training to the required level for registration with the UKCP. As set out above, these organisations are referred to as its OMs.

The OMs make decisions about whether people who have trained through alternative routes have the necessary equivalent skills and training for registration with the UKCP. As noted under Standard Two, it is not clear whether there are any common principles underpinning the equivalence route, and what people can expect

https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/guidance-documents/annual-review-process-guide.pdf?sfvrsn=e5c7220_19

¹² https://www.nice.org.uk/guidance/ng225

¹³ Guidance on Targeted Reviews available at:

from the different OMs. This is addressed through the Condition issued under Standard Two:

Condition One: The UKCP should ensure that its registration criteria
are set out clearly within the information that the UKCP, and its OMs
publish. This should include information about what applicants can
expect from the equivalence route process, and what criteria/guiding
principles will underpin decisions.

Oversight of education and training standards is by the UKCP's Education Training and Practice Committee. The Committee sets the minimum educational requirements that each of the OMs must meet as education and training providers. It has a Regulation and Quality Assurance team which checks these requirements are in place at initial assessment, and at each quality assurance check, which will be at least once every five years. Risk-based organisational member reviews are carried out where the UKCP has received information, or identified trends, that suggest there is a particular risk.

The Accreditation Panel determined that overall, the UKCP appears to have robust processes in place for ensuring that its education and training providers delivery appropriate standards of training. We issued a Recommendation for the UKCP to provide clear information about the different education and training routes on its website:

 Recommendation One: The UKCP should consider how to set out information about education and training routes more clearly for the public.

We note that in December 2023, the UKCP published the following statement in relation to litigation by a student on one of the UKCP's training provider's courses: https://www.psychotherapy.org.uk/news/litigation-pursued-by-james-esses-gender-critical-beliefs/. The issue of how the UKCP ensures that its education providers are compliant with the Equality Act 2010 on an ongoing basis will be reviewed through our upcoming Standard Nine (Equality, Diversity and Inclusion) assessment.

On 22 January 2024, UKCP submitted a Notification of Change for adopting the Scope of practice and education for the counselling and psychotherapy professions (SCoPEd) framework¹⁴. We will be assessing this as part of the wider submission from other SCoPEd partners in due course, noting that the UKCP has submitted a NoC for ScOPED.

Standard 5: Complaints and concerns about registrations

The Accreditation Panel found that Standard Five was met. It issued the following Recommendation:

 Recommendation Two: the UKCP should formalise its process for ensuring other ARs are notified of disciplinary outcomes.

¹⁴ More info at: Scope of practice and education for the counselling and psychotherapy professions (SCoPEd) | UKCP

Accreditation Panel findings

Complaints about registrants are considered under the UKCP's Complaints and Conduct Process (CCP). There are guidance documents for registrants, complainants and witnesses involved in the process¹⁵. The published guidance covers the broad areas required to meet Standard Five. This includes guidance on indicative sanctions, and the publications policy for fitness to practise outcomes. There is a process for appealing fitness to practise outcomes.

The UKCP has also developed guidance for witnesses. This sets out that complainants will be supported by a Professional Standards Manager and provides information about further support where required. The complaints and conduct process also provides for special measures to be adopted for vulnerable witnesses.

The UKCP's processes allow for interim suspensions to be issued where it is deemed necessary for public protection in the meantime to a final fitness to practice decision. The names of registrants subject to an interim suspension are included on the webpage where other fitness to practise decisions are published¹⁶. We have issued a Condition under Standard Two for the UKCP in relation to publication of interim suspensions for register entries.

Decision makers are provided with unconscious bias training. Panels considering complaints can also draw on independent legal assessors where required.

Complaints processes are overseen by the Professional Conduct Committee (PCC). The remit of the PCC is to oversee the role, function and management of the CCP. PCC members review complaints and advise on whether complaints should be referred to an Adjudication Panel. There is lay involvement in decisions about individual fitness to practice cases. The PCC publishes an annual report setting out key statistics for the years covered¹⁷.

The UKCP is a signatory to the Accredited Registers Information Sharing Protocol, which guides how fitness to practise decisions are shared with other Accredited Registers. We noted that the UKCP did not appear to have any specific reference to this in its policies and issued the following Recommendation:

 Recommendation Two: the UKCP should formalise its process for ensuring other ARs are notified of disciplinary outcomes.

The Accreditation Panel did not have any concerns about the UKCP's processes for considering complaints about registrants.

Standard 6: Governance

The Accreditation Panel found that Standard Six was met.

Accreditation Panel findings

The UKCP is a registered charity and a company limited by guarantee. It is overseen by a Board of Trustees which sets strategy and policy, defines organisational goals, and evaluates performance.

¹⁵ Available at: https://www.psychotherapy.org.uk/ukcp-members/complaints/how-to-make-a-complaints/

¹⁶ Hearings and decisions (psychotherapy.org.uk)

¹⁷ Professional conduct committee | UKCP (psychotherapy.org.uk)

Information about the UKCP's Governance arrangements is published on its website¹⁸. This includes clear information about the remit and composition of the Board and supporting Committees. Minutes from Board meetings are published.

The Board is made up of members elected by the UKCP membership as well as lay trustees. The UKCP's Articles of Association require it to have up to three Lay Trustees (not UKCP members and not from a health or psychological profession) on an ongoing basis. Board trustees are required to comply with the Conflicts of Interest policy. The Board oversees the remit and work of an Executive Committee, which is responsible for leading on the implementation of UKCP strategy and supporting the Chief Executive in developing and delivering the business plan within the overall strategic plan.

There is clear separation of function and decision making between the Board, and Committees tasked with oversight of the UKCP's Register. For example, the PCC is chaired by an independent lay person, and it operates independently from the rest of the organisation. There is an Equality, Diversity and Inclusion (EDI) Committee that sets out an EDI Action Plan. The UKCP appears to be actively engaged in promoting EDI in a range of areas, and this will be considered further as part of the upcoming Standard Nine (EDI) assessment.

The UKCP has relevant organisational policies in place. This includes a Data Protection Policy, and a procedure for raising organisational complaints.

We noted that while the UKCP's aims as stated on its website¹⁹ have a clear focus on public benefit, its Articles of Association appeared more focused on the development of the profession. The Accreditation Panel considered that although the UKCP's focus on public protection is demonstrated through its work on areas such as complaints, it would be beneficial to consider a clearer focus on this when its Articles are next reviewed.

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

The Accreditation Panel found that Standard Seven was met.

Accreditation Panel findings

The UKCP holds a strategic Risk Register and a separate register documenting registrant risk which are both presented to its Board for review and comment on a periodic basis. We reviewed the registrant risk register in detail as part of our Standard One assessment and did not identify any concerns.

The UKCP's website²⁰ provides information to inform decisions by those seeking therapy. This sets out a description of what psychotherapy is and includes a set of Frequently Asked Questions.

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¹⁸ https://www.psychotherapy.org.uk/about-ukcp/how-we-are-structured/ukcp-committees/

¹⁹ https://www.psychotherapy.org.uk/about-ukcp/our-aims/

²⁰ Seeking therapy | UKCP (psychotherapy.org.uk)

The Accreditation Panel did not have any concerns about the UKCP's processes for the management of the risks arising from the activities of registrants.

Standard 8: Communications and engagement

The Accreditation Panel found that Standard Eight was met.

Accreditation Panel findings

The UKCP's current website launched in December 2020 following a year of research design, development including interviews and surveys with internal and external stakeholders. Key information relating to the UKCP's Register, such as how to make a complaint about a registrant, is easy to find. We note that the UKCP is planning to review the website in 2024.

There is clear information about the different membership types which explains the different rules for the categories for membership for student, trainee, clinical, non-clinical, retired, and affiliate membership. It also explains the process for qualification for those who are new to psychotherapy and for those who are already qualified, as well as the process for organisational registration.

The UKCP has mechanisms in place to seek, understand and use the views and experiences of service users and other stakeholders. The UKCP told us that its current focus is on service-led user information, which involves partnering with policy campaigns and external organisations to capture relevant data that can inform its work. Examples include a survey of the general public in 2022 to review the impact of the cost of living on their mental health.

Share your experience

We received six Share your Experience (SYE) submissions for UKCP since the time of the last assessment.

One submission related to data security. We did not identify any serious issues and have advised them to contact the Information Commissioners Office if they have remaining concerns.

Two submissions related to UKCP's complaints processes, and both were from registrants. One complaint is ongoing, and the other was about how to raise a concern with the UKCP. Both have been signposted for additional support; however we did not identify issues for us to consider now.

Two submissions related to the UKCP's guidance on gender critical beliefs, with one in support of this guidance being available, and the other raising concerns. As noted in the assessment, we will consider these points through the upcoming Standard Nine (EDI) assessment.

The sixth related to education and training and related to clarity about equivalence criteria for entry to the Register. Condition One, issued under Standard Two, relates to this area.

Impact assessment (including Equalities impact)

We carried out an impact assessment [add link to impact assessment when published] as part of our decision to accredit the UKCP. This impact assessment included an equalities impact assessment as part of the consideration of our duty under the Equality Act 2010.

The Accreditation Panel noted the Conditions issued as part of the assessment, and the areas that will be looked at in greater detail during the upcoming Standard Nine (EDI) assessment. It determined that overall, it is in the public interest to renew accreditation of the UKCP.