

Accredited Registers

Targeted Review – UK Council for Psychotherapy (UKCP)

June 2022

1. Outcome

- 1.1 As part of our 2021 annual check of the UK Council for Psychotherapy (UKCP)¹ we conducted a targeted review focusing on its complaints handling. Our review resulted in the following Condition of Accreditation, and Recommendation:
- **Condition One:** The UKCP must update its complaints materials to reflect all potential outcomes, including feedback to registrants in complaints that do not pass its initial screening. This is to be completed within three months of publication of this report. (paragraph 4.10)
 - **Recommendation One:** The UKCP should consider including unconscious bias training within its training for panellists. (paragraph 4.12)
- 1.2 We will assess how the UKCP has met the Condition within the timeframe given. We will check how the UKCP has considered the Recommendation at its next accreditation renewal assessment.

2. Background

- 2.1 We monitor Accredited Registers each year to check whether there have been significant changes to key processes or significant concerns raised that could affect whether the Standards for Accredited Registers² (the Standards) continue to be met.
- 2.2 In some cases, we might need to undertake a targeted review of the Register. This could be triggered by concerns at an annual check, or those raised in-year through our 'Share Your Experience' process. A targeted review consists of a more in-depth assessment of specific standards.
- 2.3 Following a targeted review, an Accreditation Panel considers whether the Standard(s) relevant to the Targeted Review continue to be met. The Panel may issue Recommendations or Conditions. In serious cases, it may consider suspending or withdrawing accreditation.
- 2.4 The complete assessment process for existing Accredited Registers is set out in our Annual Review Process Guide.³

3. Reasons for the Targeted Review

- 3.1 Our annual check of the UKCP's register did not identify concerns for Standards One, Two, Three, Four, Six, Seven and Eight.

¹ <https://www.psychotherapy.org.uk/>

² <https://www.professionalstandards.org.uk/what-we-do/accredited-registers/about-accredited-registers/our-standards>

³ <https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/guidance-documents/annual-review-process-guide.pdf>

- 3.2 The UKCP had received an increased number of complaints against registrants since its January 2021 annual review. We wanted to check that the increase had not affected its ability to manage complaints.
- 3.3 We noted that during this period, the UKCP appeared to have made greater use of its ability to close complaints without holding complaints hearings. We had previously issued Recommendations regarding the UKCP's Alternate Dispute Resolution (ADR) or 'early disposal' procedures and wanted to check that UKCP was managing these cases appropriately.
- 3.4 Our 'Share Your Experience' (SYE)⁴ process invites people to tell us their experience of a register. We had received concerns about a perceived lack of empathy within UKCP's communications, and of a lack of support for both complainants and registrants. We had also received a concern that UKCP may not have followed its procedures, or good practice, in its complaints handling. We wanted to check for evidence of these concerns.
- 3.5 For these reasons we felt it appropriate to conduct a targeted review of *Standard 5: Complaints and concerns about registrants*. We decided to audit a sample of complaints managed by UKCP in 2021.
- 3.6 Our findings are set out below.

4. Audit findings

- 4.1 The UKCP had accepted 99 formal complaints against registrants from October 2020 to December 2021. We randomly selected 18 complaints from different categories. We did not check cases that the UKCP confirmed were not concluded.
- 4.2 We checked five complaints that were closed by UKCP as "out of scope" of its complaints procedures
- 4.3 We checked five complaints that did not meet the UKCP's Realistic Prospect Test (RPT) – UKCP's initial screening to establish that its registrant may not be suitable to be on the UKCP register without any restrictions or conditions of practice.
- 4.4 We checked two Complaints closed under Section 6.9 of UKCP's Complaints and Conduct process (CCP)⁵ – where the RPT has been met, 'however, if the complained of behaviour is such that the Registrant has fully acknowledged, addressed it and undertakes not to repeat it, the Professional Standards Manager may, in consultation with the Professional Conduct Committee, discontinue the Complaints and Conduct Process.'
- 4.5 We checked six complaints that went to a final adjudication hearing, including appeals
- 4.6 We found that overall, the UKCP appeared to be managing complaints against registrants appropriately.
- 4.7 We found that the UKCP appeared to be applying Section 6.9 of the CCP appropriately, noting that registrants had fully acknowledged, addressed and

⁴ <https://www.professionalstandards.org.uk/share-your-experience/share-your-experience-of-accredited-registers>

⁵ https://www.psychotherapy.org.uk/media/4wghlgxz/ccp_may-2022.pdf

- undertaken not to repeat the conduct complained about. UKCP emphasised that Section 6.9 may not be applied to serious cases, even where the registrant makes such undertakings.
- 4.8 We noted that the UKCP generally maintained a professional and empathetic tone when communicating with both complainants and registrants. We did not identify any disparity between the outcomes communicated to the registrant and complainant. We noted that where a case had been closed but advice given to the registrant, the topic of that advice was communicated to the complainant.
- 4.9 We noted if a case does not meet the realistic prospect test, but professional development and reflection may be beneficial, the UKCP may issue constructive feedback or recommendations to the registrant. We saw in our audit that complainants had been informed when this advice was given, however in previous assessments we had seen cases where the complainant had not been informed. Because of this, we had previously issued a Recommendation for the UKCP to make clear that it could offer advice, however we did not think this had happened. We felt that people may not have confidence in the CCP if they were not aware of the potential outcomes or learned that some action had been taken after being told their case had been closed. To address this, we issued the following Condition:
- 4.10 **Condition One:** The UKCP must update its complaints materials to reflect all potential outcomes, including feedback to registrants in complaints that do not pass its initial screening. This is to be completed within three months of publication of this report.
- 4.11 We noted that decisions about handling of complaints, such as when appropriate to close through ADR, could be subject to unconscious bias. This did not appear to be addressed within panellists' training. In the interests of developing good practice, we issued the following Recommendation:
- 4.12 **Recommendation One:** The UKCP should consider including unconscious bias training within its training for panellists.
- 4.13 We noted a case where the complainant had been the registrant's employer. The employer had expressed concern that they were not informed of the outcome. We noted that the UKCP had changed its internal procedures to ensure all complainants were informed of complaints outcomes.
- 4.14 We noted a case where a registrant's employer suggested that further concerns existed about a registrant, however no evidence for the concerns had been provided. We suggested that it is open to registers to ask for further information about such concerns.
- 4.15 We were pleased to note an instance where a complainant had been referred to external bodies that could offer support. We suggested that UKCP might offer such information to all complainants.
- 4.16 We noted one complaint against a registrant who had received a conditional discharge⁶ and had not declared this to the UKCP as required by their terms and conditions of registration. We encouraged the UKCP to periodically remind registrants of those obligations.

⁶ <https://www.sentencingcouncil.org.uk/sentencing-and-the-council/types-of-sentence/discharges/>

5. Conclusion

- 5.1 Our targeted review resulted in one Condition of Accreditation and one Recommendation being issued. The Condition will assist the UKCP to be transparent about its complaints handling and provide confidence to those raising concerns about registrants.