

# Annual review of accreditation 2019/20

United Kingdom Council for Psychotherapy  
(UKCP)

January 2021

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## About the United Kingdom Council for Psychotherapy

### UKCP registers:

- Psychotherapists and Psychotherapeutic Counsellors working in the United Kingdom and internationally
- Psychotherapists and Psychotherapeutic Counsellors with specific skills, training and experience to work with children and families, on a specialist register.

### 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 October 2020, there were 8,455 registrants on UKCP's register.

UKCP was first accredited on 11 November 2013. This is UKCP's seventh annual review and this report covers the period 11 November 2019 to 11 November 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 the UKCP was renewed for the period of 11 November 2020 to 11 November 2021.

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

No Conditions were issued.

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

1. UKCP should update its risk register to include risks associated with the Covid-19 pandemic and send this to the Authority for review (paragraph 3.4).
2. UKCP should provide its Consensual Disposal policy to the Authority when completed (paragraph 11.8).

The following report provides of how this outcome was reached.

# 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. UKCP's register had increased by 638 to 8,455 registrants.
- 1.2 The Authority found that the Standard continues to be met.

## Standard 2: the organisation demonstrates that it is committed to protecting the public and promoting public confidence in the occupation it registers

- 2.1 The Authority noted that UKCP continued to demonstrate commitment to protecting the public. At the outset of the Covid-19 pandemic UKCP enabled its staff to work from home, produced guidance for registrants for working with clients remotely, and moved complaints hearings online. UKCP set up a [Coronavirus hub](#) which, when checked, was updated in line with the latest government information.
- 2.2 UKCP had advised that due to Covid-19, some projects had to be postponed until 2021, for example, the consideration of extending its Complaints and Conduct Process (CCP) to supervisors.
- 2.3 The UKCP had collaborated with the British Association for Counselling and Psychotherapy (BACP) and British Psychoanalytic Council (BPC) to urge the government to work with them to deliver a comprehensive mental health response to the Covid-19 crisis, and to commit to signposting the public to the best mental health support online.
- 2.4 The UKCP continued to conduct quality reviews of its Organisational Members (OMs) and annual audit of its individual clinical members, making sure they were providing high quality psychotherapy and psychotherapeutic counselling for their clients.
- 2.5 UKCP audited 234 psychotherapists and carried out 17 reviews of existing OMs and two reviews of applicant organisations. Since March 2020, all OM Reviews had been undertaken by video conferencing and UKCP reported that the transition to this change had been free of issues.
- 2.6 UKCP also worked with BACP and BPC on the SCoPEd (Scope of Practice and Education) project to produce an agreed evidence-based framework which represents the breadth of skills, knowledge, and experience of their registrants. This was broadened to include other counselling and psychotherapy registers which included a round table meeting.
- 2.7 UKCP continued to work with external stakeholders in the four countries, including NICE (regarding depression guidelines), Health Education England, the Scottish Mental Health Partnership, and feeding into the NHS 'Vision for mental health'.
- 2.8 The Authority found that the Standard continues to be met.

### Standard 3: risk management

- 3.1 The Authority had considered within UKCP's 2018 annual review that UKCP was aware registrants may have practiced 'sexual healing' as an adjunctive therapy, which was considered not part of UKCP's remit. The Authority considered that where UKCP is aware registrants are practicing adjunctive therapies such as sexual healing, the register should consider what risks they may pose to the public, what controls may be needed to protect the public, and whether the practices are compatible with registration. The Authority issued a Recommendation for UKCP to urgently develop guidance on the appropriate advertising and use of adjunctive practices by its registrants, whether as part of, or outside of, psychotherapeutic settings. Following this, at the previous annual review, UKCP demonstrated it had policies allowing it to consider matters relating to adjunctive therapies and advised that it is taking action on such a matter. The Authority considered the work that has been carried out in this area but noted that UKCP had not yet developed guidance. As a result, last year, the Authority decided to re-issue the recommendation.
- 3.2 This year, the Authority found that UKCP had considered this Recommendation. The Authority noted that UKCP's Code of Ethics and Professional Practice bolstered its requirements in this area and places ethical obligations on registrants to confirm each client's consent to the specifics of the service they will offer through a clear contract at the outset of therapy. In addition, its Code of Ethics includes the requirement that registrants must not intentionally mislead a client about the type or nature of psychotherapy offered. Where issues about an adjunctive therapy arose and there was no informed consent, UKCP stated it can consider this under its CCP. UKCP advised it had referred a matter in relation to the advertising of adjunctive therapy to an independent Adjudication Panel under the CCP. The Panel determined that there was no case to answer especially in the absence of a client complaint.
- 3.3 In addition, the Authority noted UKCP had [published guidance](#) on what a psychotherapy contract should include.
- 3.4 The Authority noted the actions taken by UKCP to address risks related to registrants' practice during the Covid-19 pandemic under Standard 2. The Authority noted it was apparent that UKCP had acted and produced guidance for its registrants on working remotely with clients. However, this was not reflected in UKCP's risk register and so the extent to which it considered potential risks emerging from this exceptional situation could not be gauged. The Authority issued a Recommendation for UKCP to update its risk register to include risks associated with the COVID-19 pandemic and to send this to the Authority for review (Recommendation One).
- 3.5 The Authority found that the 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 There were no significant changes reported or noted in the past year. As part of its due diligence, the Accreditation team reviewed records from Companies

House and the Charity Commission and noted UKCP appears to be financially sustainable.

4.2 The Authority found that the Standard continues to be met.

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

5.1 The Authority noted, as described under Standard 2, that UKCP had responded to the Covid-19 pandemic and continued to manage its register effectively. UKCP had transferred its operations online, enabling functions such as complaints handling to be managed through remote working.

5.2 The Authority found that the 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 noted that UKCP plans to undertake a review of the effectiveness of its UKCP Practitioner Research Network and make recommendations to its Board of Trustees accordingly.

6.3 The Authority found that the Standard continues to be met.

#### **Standard 7: governance**

7.1 From the July 2020 Board minutes, the Authority noted that UKCP's Governance Manager had assessed how UKCP measured-up to the [Charity Governance Code](#). The report found that UKCP performed well in most areas except for diversity. UKCP aims to address this through creation of an Equality, Diversity and Inclusion (EDI) task force.

7.2 In response to the global protests about racial injustice over the summer, UKCP published a statement, a paper from one its trustees and held a webinar looking at how the therapeutic community might respond to the call to address structural societal inequalities.

7.3 UKCP advised it was carrying out a review of its governance arrangements and had set up a 'regulation taskforce' to develop its Quality Assurance Committee. This work was to conclude in June 2021.

7.4 The Authority noted that UKCP is in the process of making extensive changes to its website and had updated its guidance on [Making a Complaint](#). The Authority checked accessibility and accuracy of the information presented at the time of assessment.

7.5 The Authority found that the Standard continues to be met.

#### **Standard 8: setting standards for registrants**

8.1 The Authority noted that UKCP's registrants adapted to the Covid-19 pandemic by working via video conferencing or telephone. Following the first lockdown, UKCP launched an online Coronavirus hub, produced [guidance](#) on

working remotely to help members to continue working safely and effectively without meeting in person, and increased its emails to registrants to once a week. UKCP advised it had liaised with the BACP and BPC to ensure a consistent approach.

- 8.2 At the previous annual review, the Authority considered how UKCP approached whistleblowing and the professional Duty of Candour. UKCP had advised that candour and whistleblowing were reflected within its Code of Ethics and in, for example, requirements to obtain appropriate consent through clear contracts, and recognising appropriate safeguarding responsibilities. The Authority had noted the importance of the Duty of Candour to public protection but recognised that it is a concept that registrants may not be aware of. The Authority decided to issue a Recommendation for UKCP to consider whether it should produce any guidance for its registrants to clarify what is required under Duty of Candour and how this fit with UKCP's Code of Ethics.
- 8.3 UKCP advised that in addition to the Code of Ethics, it had published guidance on the Duty of Candour [on its website](#). The Authority noted the guidance stated 'accountability and duty of candour is about: being transparent about what is, or could be, involved in therapy with clients; taking responsibility for acting in the clients' best interests'. The Authority found that UKCP had considered the Recommendation but suggested that UKCP might want to consider whether its relevance to registrants could be made clearer within its guidance. For example, it could acknowledge the risk that harm (psychological or otherwise) may be caused by registrants, and the subsequent responsibility to inform their client, apologise, and to offer remediation or support.
- 8.4 The Authority found that the Standard continues to be met.

### **Standard 9: education and training**

- 9.1 The Authority asked UKCP how the Covid-19 pandemic had affected training providers of programmes leading to UKCP registration, such as students' ability to meet clinical training requirements. UKCP advised it had issued guidelines and advised training organisations to adopt a pragmatic approach and support its trainees. UKCP reported no reduction of its education and training standards.
- 9.2 The Authority found that the Standard continues to be met.

### **Standard 10: management of the register**

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

### **Standard 11: complaints and concerns handling**

- 11.1 UKCP received 86 formal complaints, up from 77 the previous year. 48 complaints were investigated under UKCP's formal CCP, eight of which were referred to an Adjudication Panel. UKCP had responded to an increasing



number of concerns reported by increasing its capacity to manage complaints, and recruiting additional lay chairs and professional members for its panels.

- 11.2 The Authority noted several of UKCP's published decisions related to sexual misconduct. The Authority checked whether UKCP's Board of Trustees, or subcommittees, scrutinised such outcomes to establish, for example, whether additional guidance for registrants and their clients was needed. UKCP highlighted that its Professional Conduct Committee produces [an annual report of complaints outcomes and themes](#), which is seen by its Board before publication. The Authority will check the 2020 report when available, and consider this against UKCP's guidance on [managing professional boundaries](#).
- 11.3 The Authority checked UKCP's website and noted it contained clear information on making a complaint about registrants, and about itself, which was accessible from its [home page](#).
- 11.4 The Authority noted UKCP had introduced its 'Organisational Member (OM) Non-Clinical Complaints Procedure' for raising a concern or making a complaint to UKCP about one of its OMs.
- 11.5 At the previous annual review, the Authority noted that UKCP's approach was to write letters of recommendation and advice to registrants for complaints which were not serious enough to be referred to an Adjudication Panel but where feedback needed to be provided to the registrant. The Authority noted that this approach may have contributed to concerns raised about the parity of information provided within the complaints process between the registrant and complainant. The Authority issued a Recommendation for UKCP to ensure its complaints procedures, and guidance, clearly state the potential outcomes and to consider how these will be communicated.
- 11.6 UKCP referred to its updated guidance on [Making a Complaint](#) which includes that:

'...if the complained behaviour is such that the Registrant has fully acknowledged, addressed it and undertakes not to repeat it, the Case Manager may, in consultation with the Professional Conduct Committee, discontinue the CCP. If the behaviour is repeated in the future, the Case Manager may re-start the CCP.'
- 11.7 The Authority found that UKCP had considered the Recommendation, however emphasised that UKCP should ensure all parties to the complaint are appropriately informed of such outcomes and that an appropriate tone is employed when doing so.
- 11.8 UKCP had previously reported that its letters of recommendation and advice were not part of a formal 'alternate dispute resolution' (ADR) policy. Due to the increased number of recent complaints received, UKCP was planning to implement a system of 'consensual disposal' allowing cases to be closed based on the acceptance of allegations by a registrant. The Authority issued a Recommendation for UKCP to provide this process to the Authority when completed (Recommendation Two).
- 11.9 At the previous annual review, the Authority had considered a third-party concern raised against the UKCP where a registrant had not disclosed information to the UKCP, as they could not obtain consent to do so due to the

death of the client. The Authority had noted UKCP's guidance stated registrants are 'permitted to divulge confidential information to their supervisor, their organisational member, and professional indemnity insurers about the therapy / the person making the complaint and the allegations.' UKCP's updated Code of Ethics had referred to non-specific 'ethical limits to confidentiality'. The Authority noted that it was important for information and guidance to be clear and so issued a Recommendation for UKCP to make clear in its guidance that it may not be able to investigate complaints where the client's information is not disclosed, or consent cannot be obtained.

- 11.10 The Authority noted UKCP's [Guidance for Psychotherapists](#) states that
- 'The duty of confidentiality exists even when a therapeutic relationship comes to an end. However, if you are subject to a complaint, you will need to share information with relevant parties such as your supervisor, your organisational member and your professional indemnity insurers about the therapy, the Complainant and the allegations.'
- 11.11 The Authority noted that UKCP can also consider anonymous complaints with independently verifiable information and it had stated that it could consider third party complaints without the client's consent or information where possible. The Authority found the Recommendation had been considered.
- 11.12 The Authority noted a CCP outcome posted on the UKCP website involving a registrant who also been registered with, and removed from, another Accredited Register. The UKCP had found misconduct for the same matters that led to removal by the other register however found no impairment. The Authority asked UKCP whether that decision had been made with regard to [Standard 10e](#): "Recognises decisions regarding professional conduct made by regulatory bodies and other registers accredited by the Professional Standards Authority when deciding whether a person should be admitted, kept on or removed from their register.' The Authority noted UKCP's response that it had obtained legal advice that its approach was in line with the Standard.
- 11.13 The Authority considered responses to its Share Your Experience process regarding handling of complaints by UKCP. These were shared with UKCP with the consent of the sender for UKCP's response. Themes arising are discussed below.
- 11.14 The Authority noted a perceived high level of legal intervention, or response, to complaints managed by UKCP. The UKCP had advised that registrants' legal representation is funded by insurers and involved in the complaints process from an early stage, as advised by UKCP.
- 11.15 The Authority noted a concern that UKCP may not have considered an allegation of financial dishonesty by a registrant. UKCP had confirmed it could consider any matter arising outside the therapeutic relationship that occurred after 1 October 2019. UKCP would test this against Code 32 of its [Code of Ethics and Professional Practice](#): 'Act in a way which upholds the profession's reputation and promotes public confidence in the profession and its members, including outside of your professional life as a UKCP practitioner'.
- 11.16 The Authority considered whether there were further actions, such as clearer guidance, UKCP could take with regards to handling of concerns about sexual

boundaries to protect the public. The Authority noted the explicit requirements in UKCP's Codes against "sexual contact or sexual relationship with clients" and that [guidance for clients about UKCP's ethical standards](#) was provided on the UKCP website. The Authority noted that concerns involving matters after 1 October 2019 could be considered against Code 32, as above. Events occurring prior to that could be considered under UKCP's previous codes if a registrant had received a conviction or caution for a criminal offence.

11.17 The Authority found that the Standard continues to be met.

### Share your experience

12.1 The Accreditation team received 12 responses to its invitation to Share Your Experience within the assessment period and throughout the accreditation year. 11 of these were addressed to the UKCP for its response. Two concerns regarded inappropriate use of the UKCP's logo, and the Authority noted the actions taken in response to these. The remainder regarded the handling of complaints by UKCP. The themes raised within these were considered as part of the assessment of Standard 11.

### Impact assessment

13.1 The Authority took account of the impacts on different groups when making its decision to reaccredit UKCP.

### Equality duty under the Equality Act 2010

- 14.1 The Authority noted UKCP's plans to form an EDI (Equality, Diversity and Inclusion) taskforce following a review against the [Charity Governance Code](#).
- 14.2 The Authority noted that in response to global protests about racial injustice, UKCP published a statement, and a paper written by one of its trustees. UKCP held a webinar looking at how the therapeutic community might respond to the call to address structural societal inequalities.
- 14.3 The Authority had regard to its duty under the Equality Act 2010 when considering the application for renewal of accreditation.