

Accredited Registers

Condition Review:

Association of Christians in Counselling and Linked Professions (ACC)

1. Outcome

- 1.1 At the ACC's 2022 accreditation renewal, the Professional Standards Authority ('we') issued the ACC with two Conditions on its accreditation, to be completed by 20 January 2023 (see paragraphs 1.1-1.3 of the published outcome)¹.
- 1.2 This report outlines our assessment of the actions taken by the ACC to satisfy the Conditions.
- 1.3 We found that the ACC had met Conditions One and Two.

2. Background

- 2.1 We assess Registers against our *Standards for Accredited Registers* ('the Standards')². Where a Register has not met a Standard, we can issue Conditions. A Condition sets out the requirements and the timeframe that a Register must meet.
- 2.2 At the ACC's 2022 accreditation renewal, completed in October 2022, we issued two Conditions which had to be implemented by 20 January 2023:

Condition One:

The ACC must address issues raised regarding a complaints process that was different to that published on its website, and to the one reviewed by the Authority in its previous assessments. This should include:

- a) Ending immediately the new complaints process and reinstating the previous process that was approved by the Authority.
- b) Where (a) will lead to difficulties with currently open complaints, finding a way of managing those complaints in a way which is consistent with good practice in complaints handling and with good practice for such processes and the requirements of the Human Rights Act, including the right to a fair trial.
- c) Providing a plan for development of an updated complaints procedure. This must include appropriate independent support to assure that its process is fair, transparent, consistent, explained clearly, and legally sound. The process must include lay participation at appropriate stages and clearly set out the actions it can take to manage serious concerns against registrants.

¹ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/panel-decisions/association-for-christian-counsellors/221013-acc-2022-targeted-review-outcome.pdf?sfvrsn=892e4b20_1

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

Condition Two:

The ACC must provide a report on how it will amend its governance mechanisms to ensure clear and transparent decision-making on future changes to key regulatory processes, and compliance with our rules for Accredited Registers scheme will be achieved. This must demonstrate insight of why the issues identified arose and include mechanisms to assure that the ACC's future actions are appropriately considered, recorded, and communicated.

- 2.3 We reviewed the following evidence:
- a) The ACC's website and published complaints procedures
 - b) The ACC's reports of how it had addressed the Conditions
 - c) Supplementary evidence including examples of the advice the ACC had received, internal survey reports, and the tools it subsequently developed.

3. Concerns leading to the Condition

- 3.1 We conducted a Targeted Review following the ACC's 2022 annual check. The reason for this was that we discovered that the ACC had applied a piloted process for all complaints received since 2019, without appearing to have published the procedure or informing the Authority. We needed to establish whether the new procedure could affect the ACC's compliance with Standard 5.
- 3.2 The ACC's pilot process aimed to triage and resolve concerns in a non-confrontational and time efficient manner, using mediation where appropriate. While we recognised this could have benefits for the handling of lower risk cases, we had concerns about whether it would be appropriate for more serious allegations that could lead to disciplinary sanctions, including a registrant's removal from the register.
- 3.3 We had been concerned that the ACC was piloting its new procedure for all cases received without appearing to make this clear to the public, registrants, or to us. There did not appear to be any public record of the decision by the ACC to launch the pilot. Consequently, it was unclear whether the impact of key changes, for example to hold final hearings in private, were considered. We considered there seemed to have been an oversight in governance of decision-making, and how those decisions were communicated. We issued Condition Two to ensure oversight of changes to regulatory processes remain compliant with the Standards for Accredited Registers.
- 3.4 Further details can be found under Standards 5 and 6 of the ACC's October 2022 assessment outcome (see footnote 1).

4. Assessment of Condition One

- 4.1 The ACC provided its response to Condition One within the required timeframe.
- 4.2 The ACC had reinstated its previous complaints procedure³. This had been published on its website and amended to reflect the ACC's updated name, branding and some job titles. We noted the ACC had swiftly fulfilled this part of the Condition.
- 4.3 The ACC explained how it was managing complaints that were underway at the time the Conditions were issued. We noted that the ACC had consulted its Register Advisory Panel (RAP) and sought expert independent advice. We did not have concerns about how those cases appeared to be being handled.
- 4.4 The ACC set out the approach it was taking to develop a new complaints procedure, which has three main phases. The first includes an independent review of its piloted process, comparison with other Accredited Register's complaints processes, and checking against the requirements of Standard Five. The second is to redesign the process using that learning, to develop supporting guidance and processes, and to submit the plan to us to review. Finally, the ACC intends to address feedback, seek RAP and Board approval, communicate the new process, and assure that all roles required for the process are ready.
- 4.5 We considered that the ACC fulfilled the requirements of Condition One. We did not require an updated complaints process to be submitted under this Condition so will consider that when submitted as part of the ACC's next assessment, which is due in June 2023⁴.

5. Assessment of Condition Two

- 5.1 The ACC provided its response to Condition Two within the required timeframe.
- 5.2 The ACC set out how it had reflected on the events leading to this Condition, including that it had not proposed the piloted process to the RAP and Board for consideration. The ACC noted that submitting that procedure under our Notification of Change process would have assisted it to identify and act on risks arising within complaints handling.
- 5.3 The ACC set out that it had surveyed its Board, RAP and Senior Management Team (SMT) and reviewed how it worked in compliance with good governance and decision making.
- 5.4 From this the ACC determined that those in governance and senior management roles must have ownership of the Standards for Accredited Registers as they apply to their organisation. To assist this, it noted that its decision making should be transparent and systematic. This would help prioritise its focus on regulation, governance, and the impact of its decisions.

³ https://acc-uk.org/public/docs/Complaints/Re_instated_Complaints_Policy.pdf

⁴ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/guidance-documents/notification-of-change-process-guide.pdf?sfvrsn=33d37520_9

- 5.5 To achieve this, the ACC advised it would delegate responsibility for compliance with the Standards to Board members, one of whom will attend RAP meetings as an observer to understand issues relating to the register. The ACC would develop tools to assist decision making, impact assessments and communication of decisions. Meeting agendas and papers would prioritise regulatory issues, and minutes would be improved to assist audit trails of decision making. The ACC would provide training at all levels to assist awareness of the Standards for Accredited Registers.
- 5.6 We noted the ACC's insight and subsequent actions to help improve governance mechanisms at its Board, RAP and SMT levels. The ACC's new processes could help ensure clear and transparent decision-making, in compliance with the Standards for Accredited Registers. We considered that the ACC had fulfilled the requirements of Condition Two accordingly.

6. Conclusion

- 6.1 We therefore found that the ACC had fulfilled the requirements of Conditions One and Two. Standard Five and Six were found to have been met accordingly.