# **Accredited Registers**

# Condition Review: UK Association of Humanistic Psychology Practitioners (UKAHPP)

# Date: July 2025

The UK Association of Humanistic Psychology Practitioners (UKAHPP) withdrew from the Accredited Registers programme on 18 July 2025. In line with our Publications Policy, we published the report of the Accreditation Panel which met on 16 May 2025 to consider the UKAHPP's Condition Review.

professional
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## 1. Outcome

- 1.1 At UKAHPP's full renewal assessment, published in September 2023, the Professional Standards Authority ('we'), issued thirteen Conditions on its accreditation. These Conditions had varying deadlines; however, all were to be completed within 6-months<sup>1</sup>.
- 1.2 In July 2024, we completed an assessment of the actions UKAHPP had taken to meet these conditions. We found that while some conditions had been met, Conditions four, nine, eleven, twelve and thirteen remained outstanding. These Conditions were escalated to an Accreditation Panel, who re-issued Condition Four with a four-month deadline, and Conditions nine, eleven, twelve and thirteen with a three-month deadline. Further details can be found in the published report<sup>2</sup>.
- 1.3 This report sets out our assessment of the actions taken by UKAHPP to satisfy the re-issued Conditions.
- 1.4 We found that UKAHPP had met Condition four, and had not met Conditions nine, eleven, twelve and thirteen.

## 2. Background

- 2.1 We assess registers against our *Standards for Accredited Registers* ('the Standards'<sup>3</sup>. 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 UKAHPP's full renewal assessment, published in September 2023, we issued thirteen Conditions (a full list is published on UKAHPP's directory page). These conditions had varying deadlines, however, all were required to be completed within 6-months. At our review, we found that Conditions four, nine, eleven, twelve and thirteen remained outstanding, and an Accreditation Panel, decided to reissue these for a further four-months (condition four) and three-months (conditions nine, eleven, twelve and thirteen). This report discusses the

<sup>&</sup>lt;sup>1</sup> <u>Accreditation renewal report - Standards 1-8 UK Association of Humanistic Psychology Practitioners</u> <u>September 2023.pdf</u>

<sup>&</sup>lt;sup>2</sup> UK Association for Humanistic Psychology Practitioners | PSA

<sup>&</sup>lt;sup>3</sup> Accredited Registers Evidence framework 2023

actions taken by UKAHPP to address the Conditions, as well as our decision about whether the Conditions are met.

**Condition Four:** UKAHPP must make it clear that screening clients based on protected characteristics is unacceptable and may result in disciplinary action should it become aware of registrants doing so.

**Condition Nine:** UKAHPP must introduce a proportionate system of checks to assure that registrant's website and advertising meets its Standards.

**Condition Eleven:** UKAHPP must change its complaints process to make clear that it assumes responsibility for investigating and prosecuting complaints, with the complainant as the witness rather than prosecutor in cases that reach the threshold for formal hearings.

**Condition Twelve:** UKAHPP must implement tools and processes to assist its identification and mitigations of new risks that could affect its ability to operate the register.

**Condition Thirteen:** UKAHPP must implement tools and processes to assist its identification and mitigation of new risks to the public occurring within registrants' practice.

- 2.3 We reviewed the following evidence:
  - a) UKAHPP's reported actions about what it had done to meet Conditions four, nine, eleven, twelve and thirteen.
  - b) Our own assessment of UKAHPP's website.

## 3. Concerns leading to Condition Four

- 3.1 During UKAHPP's 2023 full renewal assessment, we identified advertising concerns in relation to a particular registrant's website, upon which it was stated that they were unwilling to work with clients possessing certain protected characteristics. We considered that it is appropriate for practitioners to be clear about their area of specialism and limits of their competence, however it is not appropriate to reject clients based on protected characteristics as this could be direct or indirect discrimination or could be perceived as discriminatory. As such, Condition Four was issued, with a three-month deadline.
- 3.2 In 2024, at completion of this deadline, we reviewed actions taken by UKAHPP to meet this Condition<sup>4</sup>. UKAHPP told us they had updated sections 2.8 to 2.13 of their Code of Practice and Ethical Principles as a result of the implementation of the Condition. We found that while UKAHPP had updated their Code of Practice, the Code of Practice was still not clear enough that screening clients based on protected characteristics was unacceptable and may result in disciplinary action. We assessed that the changes made to the Code of Practice still appeared to blur the lines between a registrant's competence, and their personal prejudices. As such, this Condition was escalated to an Accreditation Panel.
- 3.3 The Accreditation Panel noted the efforts of UKAHPP to make changes to the Code of Practice but ultimately considered that the approach fell short by

<sup>&</sup>lt;sup>4</sup> <u>Accredited Registers - Condition Review - UK Association of Humanistic Psychology Practitioners</u> (UKAHPP).pdf

conflating the holding of a belief that is discriminatory with a limitation to competence. The Panel noted that this is a subject that requires careful balancing of the rights attached to the protected characteristic of the beliefs of a registrant and the protected characteristics of potential service users. As such, the Accreditation Panel awarded UKAHPP with a second opportunity to address the Condition and decided to reissue the condition with a four-month deadline to provide time for UKAHPP's officers to revisit the position and seek governance approval if necessary.

3.4 Further details can be found on page 3 of UKAHPP's Condition Review report<sup>4</sup>.

## 4. Assessment of Condition Four

- 4.1 UKAHPP told us that in 2025-2026 they will be updating their website to publish further EDI information, including UKCP's EDI Statement.
- 4.2 UKAHPP did not provide any further information pertaining to changes made to their Code of Practice (specifically sections 2.8 and 2.9), and so this was escalated to an Accreditation Panel for consideration.
- 4.3 The Accreditation Panel considered UKAHPP's Code of Practice<sup>5</sup> and what UKAHPP had done in response to the condition. The Accreditation Panel considered sections 1.2.8 and 1.2.9 (previously 2.8 and 2.9) and ultimately determined that it was clear from these two sections that UKAHPP registrants are not to screen clients based on protective characteristics. The Accreditation Panel considered section 1.2.9 which states that "...registrants retain the right...to declare if they do not feel themselves sufficiently competent or informed to be able to work with a certain client presentation. At this point, they may be able to offer a referral to a more suitably informed colleague. This will, therefore, reflect an individual practitioner's ethical assessment of their own suitability to work with a particular individual client and does not represent any kind of screening on protective [sic] characteristics."
- 4.4 The Accreditation Panel noted that while the Code of Practice appeared to make it evident that screening clients based on protected characteristics is unacceptable, no information cautioning that doing so may result in disciplinary action could be located.
- 4.5 Ultimately, the Panel found that the condition was met, as it could be determined from Code of Practice that screening clients based on protected characteristics is prohibited. The Accreditation Panel did also however believe that it should be clearer that registrants found to be engaging in such conduct could face disciplinary action; and therefore issued a recommendation for UKAHPP to consider improving the clarity of the statement.

# 5. Concerns leading to Condition Nine

5.1 At UKAHPP's 2023 full renewal assessment, we identified some concerns regarding UKAHPP's management of their register. In completing our website checks, we identified some concerns raised about a registrant's website, and

<sup>&</sup>lt;sup>5</sup> Code of Practice and Ethical Principles | UKAHPP

the types of treatments advertised by some registrants. As such, we thought that UKAHPP should undertake sample checks of registrant's websites and other public presentation and issued Condition nine with a six-month deadline.

- 5.2 In 2024, at completion of this deadline, UKAHPP told us that their Registrar had stepped down from the organisation in early 2024, and a new audit plan had been agreed with new Registrar. UKAHPP informed us that the new Registrar would be undertaking checks on the website and registrant advertising and would implement the audit of sample registrants in July 2024.
- 5.3 While we acknowledged that UKAHPP had informed us of this plan, we found ultimately considered that UKAHPP did not provide any documentation to evidence the steps taken to complete these checks. The matter was escalated to an Accreditation Panel who acknowledged that brief information had been provided in relation to website monitoring, but that this did not meet the requirement of the condition to introduce a proportionate system of checks to ensure that registrant's websites and advertising met its standards. As such, the Condition was re-issued for three months.
- 5.4 Further details can be found on page 7 of UKAHPP's Condition Review report<sup>4</sup>

#### 6. Assessment of Condition Nine

- 6.1 UKAHPP provided a further response to this condition on 27 January 2025. They told us that registrants are provided with a UKAHPP logo when joining, and are provided with information about how to use the logo appropriately.
- 6.2 Members are expected to annually declare that they abide by UKAHPP's Codes and Procedures which state that "registrants are responsible for representing their professional profile, services provided and organisational affiliations accurately."
- 6.3 Furthermore, the re-accreditation policy ensures that registrants periodically reflect on their practices, including adhering to ethical marketing and representation standards. This process includes peer appraisal and self-assessment, which can highlight any discrepancies in advertising.
- 6.4 UKAHPP also reported to us that their Registrar conducts Quality Assurance Checks on registrants regularly, which may include verifying public representations (such as websites and advertising) to ensure compliance with ethical and professional standards.
- 6.5 UKAHPP referred us to their Procedure for Processing Accreditation Applications, specifically section 2 which states "the Registrar holds responsibility for holding the UKAHPP Register and for conducting Quality Assurance Checks/Audits. The Registrar will refer any anomalies for the attention of Committee Chairs."
- 6.6 While we acknowledge the information contained in this policy, it remains unclear what this Quality Assurance Process entails. It is not known what assessment the Registrar undertakes, nor the frequency at which these Quality Assurance Checks take place. Additionally, the document appears to be dated August 2019, so it is unclear what updates the UKAHPP have made since the imposition of this Condition in 2023.

- 6.7 Furthermore, at the previous Condition Review assessment, conducted in June 2024, UKAHPP told us that they had met with their new Registrar in April 2024 to agree on an audit plan for 2024 and beyond. They also told us that their Registrar had started checks on website and advertising and would be implementing an audit of sample registration from 1 July 2024. UKAHPP have not provided us with any further information to follow on from these statements, and it appears there is a gap between what is occurring now, and what the UKAHPP have previously told us.
- 6.8 Notwithstanding the above, UKAHPP told us they have a complaint and feedback mechanism for addressing concerns from the public about registrants' practice, including misleading advertising. The Ethics Committee has a role in ensuring that registrants' conduct aligns with UKAHPP's ethical principles.
- 6.9 UKAHPP provides registrants with a 'Guidance for Working Online' document which emphasises the need for accuracy and confidentiality in digital platforms. Registrants are required to engage in CPD which includes staying updated on ethical practices and advertising standards.
- 6.10 UKAHPP told us a number of changes they anticipate being made in 2025-2026, which relate to website and advertising expectations for their registrants. UKAHPP also plan to formalise minutes and detailed agendas for all subcommittee meetings. For instance, the Accreditation and Ethics Committee will maintain comprehensive records of all Quality Assurance Checks. Both these changes are subject to approval at Board meeting.
- 6.11 Notwithstanding the information UKAHPP provided in response to this condition, it was ultimately assessed that this Condition was not met, and the decision was made to refer this to an Accreditation Panel.
- 6.12 Our findings indicated that UKAHPP have potentially misunderstood the requirements of the Condition. We considered that the resources UKAHPP provided us with places the onus on the registrant to comply with UKAHPP standards, and do not shed light on what UKAHPP's process is upon identification of non-compliance, or how compliance is ensured.
- 6.13 Furthermore, we have not been provided with any documentation or policy which sets out what UKAHPP's quality assurance process looks like in relation to appropriate advertising.
- 6.14 The condition required UKAHPP to introduce a proportionate system of checks to assure that their registrants are compliant with their own standards in relation to their websites and advertising. We feel that UKAHPP have failed to adequately advise us of what actions they have taken to meet this requirement and instead have directed us to their own requirements for their registrants.
- 6.15 The Accreditation Panel met to analyse UKAHPP's response to this Condition and found that the absence of documentation regarding UKAHPP's quality assurance processes renders the Condition as not met. Furthermore, the Accreditation Panel found that the information submitted placed emphasis on registrant compliance rather than register activity to provide assurances, and ultimately considered that UKAHPP had failed to meet the requirements of the Condition.

# 7. Concerns leading to Condition Eleven

- 7.1 During UKAHPP's 2023 full renewal assessment, we became concerned that UKAHPP's complaint procedure required the complainant to state their concerns and to ask questions of the registrant (through UKAHPP's panel). We found that only in exceptional circumstances would parties be heard separately, or without asking questions of the other parties (such as where concerns are of a sexual nature). We thought it was inappropriate for complainants to do so as they should not be responsible for making arguments about how the UKAHPP's Codes have been breached; that should be the responsibility of the UKAHPP. There is a risk that requiring the parties to address each other in some fashion could cause distress and dissuade people from raising concerns. We note that our Standards require that where a complaint is heard before a formal panel, the complainant's role should be that of a witness. This resulted Condition eleven being issued for six-months.
- 7.2 At the deadline, we assessed actions taken by UKAHPP to meet the condition.
- 7.3 We found that while UKAHPP had updated some parts of their complaints procedure, section 6.21 'Adjudication' still reflected that it was the requirement of the complainant to put forward their case. We noted that in section 3.21.2 (the investigation stage) the policy states ""in interests of fair process, from this point forward both the complainant and the registrant will be treated as equal witnesses to the complaint for the duration of the procedure." However, it appears that this contradicts section 6.21.
- 7.4 Given the inconsistencies in the complaints procedure, the matter was escalated to an Accreditation Panel.
- 7.5 The Accreditation Panel considered the conflicting information found in different sections of the complaints procedure that continued to indicate that a complainant was required to prosecute the case. The Adjudication section (section 6) of the procedure appeared to be in conflict with the information UKAHPP provided us which stated that complainants are treated as witnesses. The Accreditation Panel could not reach a decision that the condition had been met and therefore re-issued the condition with a three-month deadline.

# 8. Assessment of Condition Eleven

- 8.1 UKAHPP provided its response to Condition Eleven on 25 March 2025.
- 8.2 UKAHPP told us that registrants who have dual UKCP and UKAHPP registration will be progressed through the UKCP Complaints and Conduct Process.
- 8.3 For those who do not hold dual registration, they will be managed through the UKAHPP Complaints Procedure<sup>6</sup>. UKAHPP told us that "throughout the process UKAHPP will take responsibility for investigating the complaint. The General Secretary will initially manage and investigate the complaint and will pass the complaint over to the ethics committee (EC) should it meet the threshold. The

<sup>&</sup>lt;sup>6</sup> Complaints and Concerns | UKAHPP

EC will appoint a Complaints Co-Ordinator (CC) to manage the next steps including gathering statements and appointing of an adjudication panel (AP)."

- 8.4 We considered UKAHPP's Complaint Procedure (footnote 6) had been updated and clearly states "Once the Complaints Procedure begins, UKAHPP will act as arbiter on the case and both the complainant, and the registrant become equal witnesses to the matters under consideration." However, the procedure goes on to say "at the Adjudication Hearing, both parties to the complaint will be provided with the opportunity to explain their case in full." These tasks should be undertaken by the UKAHPP as the organisation responsible for taking the case to a hearing. Furthermore, UKAHPP still appear to publish their 'old' complaints procedure<sup>7</sup> on their website which is published under 'Codes and Procedures' and 'Complaints Procedure.' Not only is this confusing for a member of the public wishing to engage with the complaint's procedure, but it provides inaccurate and inconsistent information. The complaints procedure (published under 'complaints procedure') still states under section 6.21 that "the complainant [will] put forward their case, followed by any witness statements." We therefore still hold concerns that UKAHPP have not adequately responded to or addressed the requirements of this condition.
- 8.5 UKAHPP also reported to us that following consultation, they have decided their procedure will change to the following:

"The adjudication hearing will be conducted in a shuttle format, meaning that the complainant and the registrant will be heard separately, with no direct contact between them during the proceedings. Any clarifying questions will be communicated through the Chair. For the avoidance of doubt, the panel is responsible for investigating the complaint and determining whether any action is warranted."

- 8.6 In response to the information provided by UKAHPP, we considered that they have not adequately responded to or address the concerns that resulted in the imposition of the condition. While UKAHPP may have updated their website and complaints procedure, we found it unfortunate that it now appears more confusing to determine which the correct procedure is, given both the old and updated procedure are published on UKAHPP's website. Furthermore, UKAHPP still have not amended parts of their Complaints Procedure which reflect that the complainant is responsible for putting forward their case (for example 6.21 adjudication). As such, the matter was escalated to an Accreditation Panel for determination as to if the Condition was met.
- 8.7 The Accreditation Panel found that the information published online was contradictory and that while there were features of the Complaints Procedure which complied with the requirements of the Condition, ultimately there were other areas which did not. As a result, the Accreditation Panel determined that the Condition was not met.

# 9. Concerns leading to Condition Twelve

9.1 When completing our full renewal assessment, we identified that while UKAHPP had an organisational risk register which set out risks to its operations and

<sup>&</sup>lt;sup>7</sup> Complaints Procedure | UKAHPP

sustainability, we could not identify any information regarding this being reviewed or updated. As such, Condition twelve was issued, with a six month deadline.

- 9.2 We reviewed actions taken by UKAHPP to meet this condition.
- 9.3 In reporting actions taken to meet this Condition, UKAHPP told us their risk register undergoes a scheduled review and update every 6-months. If or when new risks are identified, they are added to the risk register immediately and are discussed at the Board meetings which occur monthly.
- 9.4 While we acknowledged the information UKAHPP provided us, we did not consider this to satisfy the requirements of condition as we noted there was no documented approach to risk management, which is required in line with our minimum standards. We considered it appropriate for UKAHPP to develop, implement and document a process regarding risk management (for example a risk management policy) which stipulates frequency of review as well as required actions, and therefore escalated the matter to an Accreditation Panel for their consideration.
- 9.5 The Accreditation Panel found that brief information had been provided in UKAHPP's response, which related to monitoring and assessing risks from operation of the register and the practice of registrants. However, this information did not meet the requirement of the condition to implement tools and processes to assist its identification and mitigation of new risks. As such, the Accreditation Panel decided to reissue the condition with a three-month deadline.

## 10. Assessment of Condition Twelve

- 10.1 UKAHPP provided a response to Condition Twelve on 27 January 2025.
- 10.2 They advised us they have developed a formal risk register that identifies, assesses and monitors potential organisational risks. From January 2025, UKAHPP have as a running agenda item, a consideration of risks faced by both internal systems and to the public. UKAHPP directed us to their AGM minutes which are published on their website to evidence this.
- 10.3 UKAHPP told us that their Board meets once a month and will continue to address risk at this level, identifying policies and procedures to mitigate risk.
- 10.4 We found that similarly to our previous assessment of this condition, UKAHPP have failed to provide us with any documentation to evidence their claims. We did not receive a copy of their risk register, nor any policies or processes they have pertaining to risk management.
- 10.5 We therefore raised this to an Accreditation Panel to assess the Condition.
- 10.6 The Accreditation Panel determined that the current processes and depth of consideration of risk were insufficient. The Accreditation Panel also found that the lack of documentation meant it was difficult to verify actions taken by UKAHPP to meet the requirements of the Condition. The Accreditation Panel therefore determined that the Condition was not met.

## 11. Concerns leading to Condition Thirteen

- 11.1 Similarly to Condition Twelve, we identified that UKAHPP's understanding of risks to service users and the public, and mitigating actions against these, were set out within their risk register. However, we were not sure if UKAHPP periodically reviewed or updated the register. Although UKAHPP advised that it learns from the outcome of complaints, concerns raised and other feedback mechanisms, we considered that there are further means to inform the UKAHPP's risk management practices. As such, we imposed Condition Thirteen, for six months.
- 11.2 We then reviewed actions taken by UKAHPP to meet the requirements of this condition.
- 11.3 In reporting actions taken to meet this Condition, UKAHPP told us their risk register undergoes a scheduled review and update every 6-months. If or when new risks are identified, they are added to the risk register immediately and are discussed at the Board meetings which occur monthly. UKAHPP also told us the Registrar will be involved in the population of this register going forward as she conducts her audits. During these audits, if the Registrar identifies any new or emerging risks, she will communicate this to the General Secretary and Head of Accreditation. This will then be brought to the Board for discussion and agreed actions. Additionally, UKAHPP provided us with their new Safeguarding Policy and noted the Code of Practice and Ethical Principles outlines how UKAHPP expects its registrants to practice while holding responsibility for risk.
- 11.4 Notwithstanding the above information provided by UKAHPP, and similarly to the concerns raised in condition twelve, we did not consider this standard to have been met. We noted UKAHPP advised us of their process, however, we did not receive any documentation to evidence this. We did not consider this condition to have been met, and as such, escalated it to an Accreditation Panel.
- 11.5 The Accreditation Panel found that brief information had been provided in the response about monitoring and assessing risks from operation of the register and the practice of registrants. However, this information did not meet the requirement of the condition to implement tools and processes to assist its identification and mitigation of new risks. As such, the Accreditation Panel decided to reissue the condition with a three-month deadline.

# 12. Assessment of Condition Thirteen

- 12.1 Similarly to Condition Twelve, UKAHPP told us that they have developed a risk register that is considered at their Board meetings monthly. UKAHPP directed us to their 'Board of Directors' Agenda to evidence this. We considered agenda item four 'consideration of any risks to our members' in conjunction with information UKAHPP told us in response to the Condition, including that their "Board meets once a month and will consider broader trends in psychotherapy and counselling to proactively address potential risks."
- 12.2 UKAHPP also reported a number of changes they anticipated being made in 2025 2026, however, these were subject to Board approval. UKAHPP may task the Ethics Committee to conduct risk reviews and develop new guidelines

to address emerging risks in registrant practice; however, this would be subject to resources issues.

- 12.3 While we acknowledged the information provided by UKAHPP, we ultimately considered that they had not address the key issues which resulted in the implementation of the Condition. We considered that UKAHPP had provided little information to evidence how they consider risks pertaining to registrant practice, and the information that had been provided appeared to not address the fundamental issues resulting in the condition. Furthermore, the information provided was general in nature, and spoke about potential changes which would be made in the future if approved by the Board; it was not clear what actions UKAHPP had taken since the Condition was imposed in 2023 and subsequently re-imposed in 2024. As such, we escalated this matter to an Accreditation Panel.
- 12.4 The Accreditation Panel agreed that little action had been taken by UKAHPP to date, and that issues relating to risk management of registrant activity remained outstanding. It was not clear to the Panel what processes or actions UKAHPP undertake to ensure UKAHPP identify and mitigation new risks to the public occurring within registrant practice. The Accreditation Panel determined that the evidence which was provided was insufficient at addressing the key issues and therefore concluded that the Condition was not met.

#### 13. Conclusion

- 13.1 The Accreditation Panel concluded that Condition Four was met, and that Conditions Nine, Eleven, Twelve and Thirteen were not met.
- 13.2 Given that these conditions have been imposed since 2023, with little progress made, the Accreditation Panel considered options available to it in regard to UKAHPP's Accreditation. These options included:
  - a) re-issuing the conditions for a further period.

b) suspend accreditation and re-issue the conditions, with consideration given to lift suspension once the conditions have been met; or

c) move directly to withdrawal of accreditation.

- 13.3 The Accreditation Panel gave consideration to section 5 (outcomes) of the Guidance for Accredited Registers<sup>8</sup>, when making their decision.
- 13.4 When considering re-issuing the conditions, the Panel felt that it could not be reassured that re-issuing the conditions would change factors and ensure that outstanding conditions are met. This view was reached on the basis that the two attempts to date have not been successful. The Panel considered recent minutes which have been published on UKAHPP's website and noted comments regarding the Conditions, which may indicated that UKAHPP are not clear in the expectations placed on them by the standards.
- 13.5 Therefore, the Panel discounted simply re-issuing conditions as being an appropriate way forward and considered its options between suspension and withdrawal.

<sup>&</sup>lt;sup>8</sup> Accredited Registers - guidance on renewing accreditation.pdf

- 13.6 Suspension was determined to be the proportionate option with a duration of no longer than 6 months. This was on the bases that there are signs of some progress in work to meet the conditions, though it is limited and insufficient to determine that all conditions are met. Suspension would also send a clear signal after a period of two years, this is the final opportunity for conditions to be met.
- 13.7 On the option of withdrawal of accreditation, the Panel felt that the matters were not serious enough to warrant a withdrawal without a further opportunity to meet the conditions. The Panel noted that withdrawal was a final step in the process, and that offering a final chance to demonstrate documentation from work that is reported to be progress, was proportionate to the aim of protecting the public given that the outstanding matters did not directly compromise patient safety in an immediate fashion.