

Accredited Registers

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

1. Outcome

- 1.1 At the UK Association of Psychology Practitioners (UKAHPP)'s reaccreditation, the Professional Standards Authority ('we') issued thirteen conditions, which were to be completed by March 2024.¹
- 1.2 We previously assessed conditions one, two and three and found these to be met. As such, this report details the actions taken by UKAHPP to address conditions four to thirteen.
- 1.3 We found that the UKAHPP had met conditions five, six, seven, eight and ten. However, we found that conditions four, nine, eleven, twelve and thirteen were not met.

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 UKAHPP's accreditation renewal, completed in September 2023, we issued thirteen conditions¹. Condition four had to be implemented by December 2023, and conditions five to thirteen had to be implemented by March 2024.

Condition Four: The UKAHPP must make 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 Five: The UKAHPP must publish a clear description of what humanistic psychotherapy is, with reference to a relevant evidence base. This must include setting out its benefits, and limitations.

Condition Six: People accessing the UKAHPP's register should be clear about the qualification held by registrants. The UKAHPP must publish or direct those accessing the register to the qualifications required for its categories of registration.

Condition Seven: The UKAHPP must improve the accessibility of its public register by providing information about all headings and terms that can be accessed from the register and its supporting webpage.

Condition Eight: The UKAHPP must clearly set out its requirements and standards for the registration of psychotherapeutic counsellors working with children and young people.

¹ [230920-ukahpp-full-renewal-outcome.pdf \(professionalstandards.org.uk\)](#)

² [Standards for Accredited Registers \(professionalstandards.org.uk\)](#)

Condition Nine: The UKAHPP must introduce a proportionate system of checks to assure that registrants' website and advertising meets its standards.

Condition Ten: The UKAHPP must improve presentation of its complaints procedures to assure these are accessible and clear to all parties.

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

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

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

2.3 This report discusses the actions UKAHPP took to address the condition, as well as our decision about whether the condition is met.

2.4 We reviewed the following evidence:

a) UKAHPP's reported actions about what it had done to meet condition four to thirteen.

3. Concerns leading to Condition Four

3.1 During UKAHPP's re-accreditation assessment¹, we became aware of a registrant's website which stated they were unwilling to work with clients possessing certain protected characteristics. We acknowledged that whilst it can be appropriate for practitioners to be clear about their areas of specialism and limits of their competence, rejecting clients based on protected characteristics could be direct or indirect discrimination or could be perceived as discriminatory. Further, we noted the registrant's position appeared to conflict with UKAHPP's Codes which state that registrants must offer a service that is "equally respectful, accessible and beneficial to all people regardless of [protected characteristics]". We believed that registrants must be able to express limitations in a non-discriminatory way and as such issued **Condition Four**.

3.2 Further details can be found under Standards One of the UKAHPP's reaccreditation outcome¹.

4. Assessment of Condition Four

4.1 The UKAHPP provided its response to the Condition Four on 13 May 2024.

4.2 In review of this Condition, we considered sections 2.8 to 2.13 of the Code of Practice and Ethical Principles³ as well as the information UKAHPP provided us.

³ [Code of Practice and Ethical Principles | UKAHPP](#)

- 4.3 We noted UKAHPP advised us they had updated their Code of Practice to include the following:

“UKAHPP Registrants do not engage in the provision of Conversion Therapy, the practice that assumes the certain sexual orientations or gender identities are inferior to other orientations and seek to actively change or suppress such orientations – Note: UKAHPP does not usually adopt the practice of highlighting examples of prohibition, preferring to set a generic standard to be applied across the range of approaches offered by UKAHPP Registrants. However the Professional Standards Authority (PSA) has made it a condition of UKAHPP’s continued accreditation that it publishes a statement highlighting that any registrant found to be practicing Conversion Therapy will be subject to disciplinary action – the PSA has not made it a condition for UKAHPP to list any other prohibitive practices.” We acknowledge UKAHPP has provided clear information to their registrants regarding the provision of Conversion Therapy.

- 4.4 In review of the initial reasons for this condition being implemented, we noted that Condition Four emphasised the necessity for UKAHPP to clarify that screening clients based on protected characteristics is unacceptable and could potentially lead to disciplinary actions against registrants if they were to do so. It also highlighted the importance of outlining competence limitations in a non-discriminatory manner. This particularly related to section 2.8 and 2.9 of the Code of Practice.
- 4.5 We were concerned that section 2.8 appeared to blur the lines between a registrant's competence (their ability to provide effective service based on their skills and experience) and any personal prejudices (biases or discriminatory attitudes against certain groups). We noted that while it is essential for registrants to acknowledge their limits of competence, it is not acceptable to equate those limits with prejudicial reasons for not working with clients. The Code suggested that prejudice could be a justifiable reason for refusing to provide services, against the principle of providing non-discriminatory services to all individuals.
- 4.6 While we note UKAHPP have updated their Code of Practice to be reflective of the concerns we previously raised, it does not appear that paragraph 2.8 has been updated following concerns raised with UKAHPP by email on 1 March 2024. As such, we consider paragraph 2.8 still appears to blur the lines between a registrant’s competence and personal prejudices and escalated this Condition to an Accreditation Panel as we considered it to be not met.
- 4.7 The Accreditation Panel noted the efforts of the UKAHPP to make changes to paragraph 2.8 of The Code of Practice and Ethical Principles but considered that the approach still fell short by conflating the holding of a belief that is discriminatory with a limitation to competence. 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 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. The Accreditation Panel also discussed the opportunity for UKAHPP to look to regulators and registers

to suitable approaches to help balance the rights of registrants and services users appropriately.

5. Concerns leading to Condition Five

- 5.1 During review of UKAHPP's website, we noted some information about the humanistic approach to psychotherapy set out on the UKAHPP's register website. We found statements which were critical of the National Institute for Health and Care Excellence (NICE) on the UKAHPP website. These suggested NICE supported an 'illness model of mental health and a symptom reduction research paradigm' that conflicted with the humanistic approach to therapy. Although this stance may be seen as backing a humanistic method, and other stakeholders have raised concerns with NICE for not adequately recognising the efficacy of counselling and psychotherapy in treating depression, we considered there was a potential risk that UKAHPP's statements may dissuade people from seeking necessary medical treatment. We also identified that although the UKAHPP's website provided information around humanistic counselling and psychotherapies, there did not appear to be a clear description of its core or associated practices. As such, we issued **Condition Five**.
- 5.2 Further details can be found under Standards One of the UKAHPP's reaccreditation outcome¹.

6. Assessment of Condition Five

- 6.1 We reviewed UKAHPP's website, particularly in relation to the 'Humanistic Psychology' page under the 'About Us' tab. We found that UKAHPP have published a clear description of what humanistic psychotherapy is, with reference to an extensive reference base, which is hyperlinked from this webpage. We also noted that the UKAHPP have highlighted both the benefits and limitations of humanistic therapy. We therefore considered Condition Five to be met.
- 6.2 From a stylistic/accessibility point of view, we noted that all sub-headings are in purple and bolded, besides the limitations heading. We acknowledge that UKAHPP may not wish to highlight the limitations of their own psychotherapy modality nor draw undue attention to them, however, consider that it is appropriate for UKAHPP to also highlight this as per previous sub-headings for transparency.

7. Concerns leading to Condition Six

- 7.1 During UKAHPP's re-accreditation assessment¹, we identified some concerns regarding UKAHPP's management of their register.
- 7.2 We noted that although UKAHPP stated the required qualifications for registration on its website, this information was not accessible from the register (in line with our minimum requirements). Further, we identified that UKAHPP's register publishes the individual registrants register categories, but not the type

of qualification. Levels of qualification were also not signposted from the register nor immediate surrounding webpages. As such, we issued **Condition Six**.

8. Assessment of Condition Six

8.1 While the UKAHPP may wish to consider adding qualifications held by registrants to the register, the information provided on the register allows individuals to cross reference the level of qualification that an individual registrant has obtained for their grade of registration. However, the introduction to section 1 of the register states that 'additional information about the training and service provided by a registrant is available on via the UKAHPP 'Find a Therapist' website facility'. This may blur the lines between the register and the find a therapist page. Additionally, not all entries on the find a therapist page provide this additional information. The UKAHPP should consider the clarity of information provided at the introduction to section 1 of the register.

8.2 Additionally, the information provided about grades of membership on the Membership and Public Protection webpages appears to differ. The Membership page provides a helpful table of registrant grades and the requirements for each. The Public Protection page outlines Full Accredited Registered Member (level 7 qualification) and Ordinary Registered Member (level 5 qualification). It does not include Accredited Registered Member, which on the Membership page is outlined as requiring a level 5+ qualification. Given the different levels of information provided by UKAHPP, we have issued the below recommendation. Nonetheless, we consider Condition Six to be met.
Recommendation: The UKAHPP should ensure the information relating to membership grades is consistent across its website.

9. Concerns leading to Condition Seven

9.1 We were concerned with the inconsistencies between the UKAHPP's processes and what was published on the register. For example, its procedure states that registration is open to 'to Psychotherapists and Psychotherapeutic Counsellors working with adults in the UK only'; however, we noted that there were practitioners on the published register marked as 'Overseas – No UK practice.' We also noted the websites 'Categories membership, registration and accreditation' were not easy to navigate or clearly linked to the public register. The inclusion of 'A Glossary of Terms' (for example) in the published register spreadsheet would aid understanding. As such, we issued **Condition Seven**.

10. Assessment of Condition Seven

10.1 In review of UKAHPP's register⁴ we noted at the bottom of Section One (registered members), UKAHPP has provided definitions of certain categories of registration which are not explained on the memberships page⁵. That is,

⁴ [UKAHPP-Register-of-Psychotherapeutic-Counsellors-and-Psychotherapists-May-2024-1-3.pdf](#)

⁵ [UKAHPP Membership and How to Join | UKAHPP](#)

UKAHPP have clarified what Honorary Life Member (HLM) and Member Emeritus (ME) may mean when appearing next to a registrants category of registration. We also note UKAHPP have clarified that for members who also hold dual registration (for example with UKCP), registration and complaints are governed by the UKCP Central Complaints Procedure. UKAHPP also confirms that for Affiliate Members who hold dual registration with another parent register, their practice is governed by the parent organisation's complaints procedure. UKAHPP also provide direct links to the other registers which their members may be affiliated with. Furthermore, UKAHPP provide appropriate direction and signposting to the 'hearings and determinations' section of the UKAHPP website for information pertaining to suspension or termination. UKAHPP also provides relevant information relating to their student registrations.

- 10.2 In light of the above, we consider UKAHPP to have taken adequate steps to address this condition and believe this condition has been met. However, while this now states what an Honorary Life Member and Member Emeritus are, it does not provide information as to how these additional grades are obtained. As such, we have issued the following recommendation.
- 10.3 **Recommendation:** UKAHPP should provide information pertaining to how HLM and ME grades are obtained, either within the register or on the webpage outlining types of registration.

11. Concerns leading to Condition Eight

- 11.1 During UKAHPP's re-accreditation assessment¹, we identified some concerns regarding UKAHPP's management of their register.
- 11.2 We noted UKAHPP states that it does not register child counsellors and psychotherapists. However, we also noticed that its Registration and Accreditation Criteria states that it will register 'School or Student Counsellors working with a recognised child/family agency or education authority. Such practitioners 'must meet the published criteria and evidence that their employer provides training, management and supervision separate from line management.' We considered that this appeared to conflict with the UKAHPP's other published information. It was not clear to us whether the UKAHPP would investigate complaints against registrants for work in such setting, and we therefore issued **Condition Eight**.

12. Assessment of Condition Eight

- 12.1 UKAHPP has clearly stated on multiple areas of their website that they do not accredit therapists who work with children and persons under the age of 18. UKAHPP does acknowledge some of their members may hold registration with other professional bodies, in which they do work with children, however, under s2.14 of the Code of Practice³ explicitly advises registrants of their requirement to declare this to UKAHPP to ensure UKAHPP have appropriate oversight of this. As such, we consider this condition met.

13. Concerns leading to Condition Nine

- 13.1 During UKAHPP's re-accreditation assessment¹, 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 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 therefore issued Condition Nine.

14. Assessment of Condition Nine

- 14.1 UKAHPP advised us that their Registrar had stepped down from the organisation in early 2024, and as such, they met with their new Registrar in April to agree for a new audit plan for 2024. UKAHPP advised us the new Registrar will commence checks on the website and advertising and will implement the audit of sample registrants in July 2024.
- 14.2 While we considered the information UKAHPP provided us, we also noted UKAHPP did not provide any documentation to evidence the steps taken to complete these checks. As such, we escalated this condition to an Accreditation Panel.
- 14.3 The Accreditation Panel acknowledged that brief information has been provided in the response about website monitoring, but that this does not meet the requirement of the condition to introduce a proportionate system of checks to assure that registrants' website and advertising meets its standards. As such, the Accreditation Panel decided to **reissued the Condition with a three month deadline**.

15. Concerns leading to Condition Ten

- 15.1 We noted that UKAHPP is an Organisational Member of the UKCP and so, concerns about a practitioner with dual registration will be managed under the UKCP Central Complaints Procedure. UKAHPP accepts and reflects decisions made under that process. However, we identified potentially confusing information noting UKAHPP has an alternate Disciplinary Procedure which considers concerns about UKAHPP officers and categories of membership that are not included on its register. It is intended to address concerns that do not involve public protection or registrants' fitness to practise. Concerns may be transferred to the main Complaints Procedure where appropriate. We were concerned about the presentation of the procedure and noted there was a risk that the Disciplinary Procedure could be confused with the Complaints Procedure by those wishing to raise concerns. Therefore, we issued **Condition Ten**.
- 15.2 Further details can be found under Standards Five of the UKAHPP's reaccreditation outcome¹.

16. Assessment of Condition Ten

- 16.1 UKAHPP advised us they have updated their website to reflect the above condition. UKAHPP has published their complaints procedure in multiple locations so that is more easily accessible. While we have considered this may be potentially confusing for those engaging with the complaints process, we have also considered that UKAHPP has differentiated between their two complaints processes on each of the above webpages. That is, on the '*Complaints Procedure*' page, UKAHPP have published information differentiating the two policies.
- 16.2 Similarly, on the 'Complaints and Concerns' page, UKAHPP have referenced the appropriate complaints policy for the differing types of complaints
- 16.3 While we have considered the reasons for the condition being issued in the first place, in that it appeared confusing to the public that there were two similarly named complaints procedures, we consider that UKAHPP addressing these concerns at the top of each complaints page provides enough clarification and clearly dictates which policy is applicable to which concern. We therefore believe that it would be clear to a lay person who may wish to engage with the complaints process which complaints procedure they should engage with.
- 16.4 While we are satisfied with the actions taken by UKAHPP to address this condition, we also consider it would be appropriate for UKAHPP to directly hyperlink to the appropriate complaints form when making reference to it for ease of accessibility. As such, we have issued the below recommendation.

Recommendation: UKAHPP should hyperlink the Complaint Disclosure Form when making reference to it for ease of accessibility.

17. Concerns leading to Condition Eleven

- 17.1 We were concerned that the UKAHPP's Complaints Procedure requires the complainant to state their concerns at hearings and to ask questions of the registrant (through the UKAHPP's Panel). Only in exceptional circumstances will 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 in us issuing **Condition Eleven**.
- 17.2 Further details can be found under Standards Five of the UKAHPP's reaccreditation outcome¹.

18. Assessment of Condition Eleven

- 18.1 The UKAHPP provided us with information pertaining to their complaints management. However, we found that the Complaints Procedure⁶ outlines a process within which the complainant is required to prosecute the case. This is particularly the case in the Adjudication section (section 6) of the Procedure. For example, at paragraph 6.21 in relation to the structure of the hearing, ‘The complainant to put forward their case, followed by any witness statements’, ‘The complainant to ask through the Panel Chair, clarifying questions about the case put forward by the registrant and witnesses they have called’ and ‘The complainant and the registrant to each make a final statement’. We believe that each of these tasks should be undertaken by the UKAHPP as the organisation responsible for taking the case to a hearing. We noted that in section 3.21.2 (the investigation stage), the policy stipulates “*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 this is inconsistent with the above information pertaining to the adjudication section. As such, we did not consider that UKAHPP had met this condition and escalated it to an Accreditation Panel.
- 18.2 The Accreditation Panel considered the conflicting information found in the Complaints Procedure that continues to indicate that a complainant is required to prosecute the case. As noted above, the Adjudication section (section 6) of the procedure appears to be in conflict with the information we have been provided stating that complainants are treated as witnesses. As a result, the Panel cannot reach a decision that the condition has been met. The Accreditation Panel decided to **reissue the condition with a three month deadline.**

19. Concerns leading to Condition Twelve

- 19.1 The UKAHPP advised us they have an organisational risk register which sets out risks to its operations and sustainability, however, we were unable to identify information regarding this being reviewed or updated. As such, we issued **Condition Twelve**
- 19.2 Further information can be found under Standard Six of the reaccreditation outcome¹.

20. Assessment of Condition Twelve

- 20.1 In assessment of this condition, UKAHPP advised us they have a risk register and there is a scheduled update and review of this every 6-months. If or when new risks are identified, they are added to the Risk Register immediately and are discussed at Board meetings which occur each month. UKAHPP also told us the Registrar will be involved in the population of this going forward as she conducts her audits.

⁶ [Complaints Procedure | UKAHPP](#)

- 20.2 While we acknowledged the information UKAHPP had provided us, we did not consider this to satisfy the 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 escalated this to an Accreditation Panel for their consideration.
- 20.3 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.**

21. Concerns leading to Condition Thirteen

- 21.1 The UKAHPP's understanding of risks to service users and the public, and mitigating actions against these, was set out within its risk register. However, we were not sure if the UKAHPP periodically reviewed or updated the register. Although the UKAHPP advised that it learns from the outcome of complaints, concerns raised and other feedback, we considered that there are further means to inform the UKAHPP's risk management practices. As such, we imposed **Condition Thirteen.**
- 21.2 Further information can be found under Standard Seven of the reaccreditation report¹.

22. Assessment of Condition Thirteen

- 22.1 UKAHPP advised us they have a risk register and there is a scheduled update and review of this every 6-months. If or when new risks are identified, they are added to the risk register immediately and are discussed at 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.
- 22.2 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.
- 22.3 Similarly to Condition Twelve, 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**.

23. Conclusion

- 23.1 Overall, conditions five, six, seven, eight and ten have been met. Conditions six, seven and ten have been met with a recommendation. Conditions four, nine, eleven, twelve and thirteen were not met during our assessment of these conditions and so, were escalated to an Accreditation Panel.
- 23.2 The Accreditation Panel also supported the findings that the above conditions were not met, and as such has reissued them, as per the below table.
- 23.3 The Accreditation Panel considered all the options available to it after determining that the conditions above had not been met. The Accreditation Panel noted the changes in leadership and currently vacant post of the Chair which has, in part, affected UKAHPP's ability to respond to the conditions. The Accreditation Panel noted the attempts to meet the requirements of the conditions and felt that in most cases the conditions required documenting practice that was summarised in the response to conditions.
- 23.4 We expect, at the next Annual Check to learn more about the support that been given to the new Chair to adapt to their new role.
- 23.5 In regard to Condition Four, we encourage UKAHPP's team to look to examples of good practice on the balancing rights and responsibilities when a registrant's protected beliefs come into conflict with a service user's protected characteristics, such as the approaches taken by other accredited registers or the GPhC's standards and guidance relevant to religion and belief.

Conditions		Deadline
Standard One	Condition Four: The UKAHPP must make clear that screening clients based on protected characteristics is unacceptable and may result in disciplinary action should it become aware of registrants doing so.	Four months
Standard Two	Condition Nine: The UKAHPP must introduce a proportionate system of checks to assure that registrants' website and advertising meets its standards.	Three Months
Standard Five	Condition Eleven The UKAHPP must change its complaints process to make clear that it assumes responsibility for investigating and prosecuting complaints, with the complainant as witness rather than prosecutor in cases that reach the threshold for formal hearings	Three Months

<p>Standard Six</p>	<p>Condition Twelve The UKAHPP must implement tools and processes to assist its identification and mitigation of new risks that could affect its ability to operate the register.</p>	<p>Three Months</p>
<p>Standard Seven</p>	<p>Condition Thirteen The UKAHPP must implement tools and processes to assist its identification and mitigation of new risks to the public occurring within registrants' practice.</p>	<p>Three Months</p>