

Accreditation renewal report

Standards 1-8

UK Board of Healthcare Chaplaincy

January 2024

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About the UK Board of Healthcare Chaplaincy (UKBHC)

The UK Board of Healthcare Chaplaincy (UKBHC) registers:

- Healthcare chaplains

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 1 January 2023, there were 424 registrants on the UKBHC register.

The UKBHC was first accredited on 17 July 2017

In November 2023 we renewed the UKBHC's accreditation with Conditions and Recommendations. They will next be due a full assessment against our Standards by November 2026.

About accreditation

The Professional Standards Authority (the Authority) accredits registers of people working in a variety of health and social care occupations that are not regulated by law. To become an Accredited Register, organisations holding registers of unregulated health and social care roles must prove that they meet our *Standards for Accredited Registers* (the Standards).

Initial accreditation decisions are made by an Accreditation Panel following an assessment of the organisation against the Standards by the Accreditation team. The Panel decides whether to accredit an organisation or not. The Panel can also decide to accredit with Conditions and provide Recommendations to the organisation.

- **Condition** – Issued when a Panel has determined that a Standard has not been met. A Condition sets out the requirements needed for the Accredited Register to meet the Standards, within a set timeframe. It may also reduce the period of accreditation subject to a review or the Condition being met.
- **Recommendation** – Actions that would improve practice and benefit the operation of the Register, but which is not a current requirement for accreditation to be maintained.

This assessment was carried out against the Standards for Accredited Registers¹ and our supporting Evidence Framework².

We used the following in our assessment of the UKBHC:

- Documentary review of evidence supplied by the UKBHC and gathered from public sources such as its website.
- Due diligence checks
- Share your experience responses.
- Assessment of the UKBHC's complaints procedures.

¹ https://professionalstandards.org.uk/docs/default-source/publications/standards/standards-for-accredited-registers.pdf?sfvrsn=e2577e20_8

² https://professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-evidence-framework-for-standards.pdf?sfvrsn=55f4920_9

The Outcome

The Accreditation Panel met on 29 November 2023 to consider the UK Board of Healthcare Chaplaincy (UKBHC). The Panel was satisfied that the UKBHC could meet, with Conditions, all the Standards for Accredited Registers.

We therefore decided to renew accreditation with 12 Conditions.

We noted the following **positive findings**:

- The UKBHC demonstrated their commitment to reviewing their disclosure processes as required and taking immediate action on issues raised during the assessment, for example, amending the website.

We issued the following Conditions to be implemented by the deadline given:

| Conditions | Deadline |
|------------------------------|--|
| <p>Standard two</p> | <p>Six months from the publication of this report</p> <p>Six months from the publication of this report</p> <p>Six months from the publication of this report.</p> |
| <p>Standard Three</p> | <p>Six months from the publication of this report.</p> <p>Three months from the publication of this report.</p> |

| | | |
|-----------------------|--|---|
| | 6. UKBHC should set explicit requirements for registrants to hold appropriate indemnity cover (whether that be through a membership organisation, employer, or other means). | Six months from the publication of this report. |
| Standard Four | 7. The UKBHC should develop a process for how it assures the quality of the education courses it accredits for entry into its register and assess applications for registration from people who have not qualified through one of its approved education providers. | Next assessment. |
| Standard Five | 8. UKBHC should ensure that its complaints process is accessible and responsive. Its guidance for the public should be clear and up to date with correct details of key roles such as the Registrar, and support should be available by telephone as well as email. 9. UKBHC must publish disciplinary outcomes on its register, so that anyone checking a registrant can clearly see if a sanction has been imposed. 10. The UKBHC must develop its policy for reporting relevant complaint outcomes to appropriate bodies, including the Accredited Registers. It must also show evidence of how it works with the NHS and other employers to share and investigate concerns about registrants. This must be completed within six months | Three months from the publication of this report. Six months from the publication of this report. Six months from the publication of this report. |
| Standard Six | 11. The UKBHC should publish Board minutes to date (or relevant extracts as related to its public protection role) from its governance meetings to improve the transparency of its decision-making. This must be completed by the time of its next assessment. | Next assessment |
| Standard Seven | 12. The UKBHC should review and update its Risk Matrix to ensure that the safeguarding risks and mitigations are properly captured and that the scores fully reflect the risk. This must be completed within three months. | Three months from the publication of this report. |

We issued the following Recommendations to be considered by the next review:

| Recommendations | |
|------------------------|--|
| Standard Two | <ol style="list-style-type: none"> 1. UKBHC should set out the minimum level of CPD that is acceptable. 2. The UKBHC should consider updating the restoration policy to include information for restoring registrants to the register following breaks that aren't due to disciplinary actions, such as parental leave. |
| Standard Four | <ol style="list-style-type: none"> 3. The UKBHC should provide information about its requirements in terms of curricula for the courses that lead to entry into the register. |
| Standard Five | <ol style="list-style-type: none"> 4. The UKBHC should document the procedure for recruitment, training, and monitoring of the committees (screening, conduct and competence, health committee, and appeal) involved in the disciplinary process. 5. The UKBHC should document its formal process for quality assuring decisions about complaints. |
| Standard Six | <ol style="list-style-type: none"> 6. The UKBHC should consider succession planning in business continuity plans. |
| Standard Seven | <ol style="list-style-type: none"> 7. The UKBHC should document the risk management process. 8. The UKBHC should expand the information it provides about the knowledge base for chaplaincy. |
| Standard Eight | <ol style="list-style-type: none"> 9. As part of its website redevelopment, review content to ensure that it is up to date, clear, and accessible. Key information about the register, complaints process and complaints outcomes should be easy to find. 10. The Accreditation Quality Mark should be displayed on the UKBHC website. 11. The UKBHC should explore options for considering views and involving the public and service users in what they do. |

About the Register

This section provides an overview of the UKBHC and its register.

| | |
|---|---|
| Name of Organisation | UK Board of Healthcare Chaplaincy (UKBHC) |
| Website | UK Board of Healthcare Chaplaincy - UKBHC |
| Type of Organisation | Private company limited by guarantee without share capital |
| Role(s) covered | Healthcare chaplains |
| Number of registrants | 424 (as of 31 January 2023) |
| Overview of Governance | <p>Information about the UKBHC's governance is published on its website. There are 14 voting members of the Board:</p> <ul style="list-style-type: none"> • Four ex-officio directors from senior representatives of Association of Hospice and Palliative Care Chaplains (AHPCC), College of Healthcare Chaplains (CHCC), Northern Ireland Hospital Chaplains Association (NIHCA) and Scottish Professional Leadership Group for Spiritual Care (SPLG) • Four appointed directors • Four lay members • A Chair • A Secretary |
| Overview of the aims of the register | <p>Information on the aims of the register can be found in its standing orders which are published on the website. These state that the purpose of the UKBHC is 'to safeguard the wellbeing of the public by ensuring that healthcare chaplains deliver the highest standards of safe and effective care.'</p> <p>The website states that the UKBHC will achieve this through:</p> <ol style="list-style-type: none"> a) maintaining a register of accredited healthcare chaplains. b) setting standards for education and practice. c) giving guidance to the registrants on matters relating to their role; and d) the provision of Professional Advisers in the filling of vacancies |

Inherent risks of the practice

This section uses the criteria developed as part of the Authority's *Right Touch Assurance tool*³ to give an overview of the work of healthcare chaplains.

| Risk criteria | |
|--|---|
| <p>1. Scale of risk associated with healthcare chaplains.</p> <p><i>a. What do healthcare chaplain do?</i></p> <p><i>b. How many healthcare chaplains are there?</i></p> <p><i>c. Where do healthcare chaplain work?</i></p> <p><i>d. Size of actual/potential service user group</i></p> | <p>a. The UKBHC state that ‘chaplains use a number of approaches, but these are centered around active listening which enables a person to voice their feelings, experience etc. that affect their sense of wellbeing. Often the act of giving a voice and empowering a person to speak about their experience is enough. A chaplain works in spheres that are sometimes difficult to quantify such as forgiveness, reconciliation, restoration, and redemption. This is different from Counselling but does enable a person to reflect and engage with themselves on an existential level. Sometimes this might be within a religious context but often not. Sometimes it may include prayer but may also use other forms of ritual that provide an opportunity to experience meaning in a wide range of human experience.’</p> <p>b. There were 424 registrants on the register as of 31 January 2023. A paper written by Snowden et al noted that in 2018 there were approximately 916 chaplains employed within the NHS in the UK and that UKBHC had achieved registration for approximately 50% of these.⁴</p> <p>c. The UKBHC state that ‘chaplains within the UK are normally employed directly by an NHS Trust/Health Board in Scotland. Others are employed by Hospices or GP surgeries.’</p> <p>d. The UKBHC note that it is difficult to indicate the number of service users that its registrants see due to the ‘widely different contexts of acute, mental health, primary care etc. and the size of hospitals. In a large acute hospital, a chaplain could easily 100 patients in a week but a chaplain in a small hospice may only see very few.’ Healthcare chaplains may also see friends and family of patients and staff members who need support.</p> |
| <p>2. Means of assurance</p> | <p>Those working within the NHS are likely to be included within clinical governance systems. Those working for other employers such as local authorities will be subject to employer checks which may include criminal records.</p> |

³ https://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/right-touch-assurance---a-methodology-for-assessing-and-assuring-occupational-risk-of-harm91c118f761926971a151ff000072e7a6.pdf?sfvrsn=f537120_14.

⁴ <https://pure.southwales.ac.uk/en/publications/why-are-some-healthcare-chaplains-registered-professionals-and-so>

| | |
|--|---|
| <p>3. About the sector in which healthcare chaplains operate</p> | <p>A paper by Snowden et al notes that chaplains have been part of the NHS since its inception in 1948. In England, until the early 2000's chaplains were funded by the NHS and managed through their church. In the early 2000's chaplains in England became directly accountable to the NHS as employees. Healthcare chaplains are recognised as part of a healthcare team as per the chaplaincy guidelines produced by NHS England, Scotland, Wales 'available on the UKBHC website and also practice in Northern Ireland.</p> |
| <p>4. Risk perception</p> <ul style="list-style-type: none"> • <i>Need for public confidence in healthcare chaplains?</i> • <i>Need for assurance for healthcare chaplains?</i> | <p>Healthcare chaplains will be meeting with vulnerable patients, friends, and family for example when dealing with distressing situations such as the loss of a child, a terminal prognosis, or the death of a loved one. It is important that the public have confidence in the healthcare chaplains to ensure they can access the care they need.</p> <p>Healthcare chaplains form part of a multi-disciplinary team responsible for the spiritual care of the patient, their family, and friends. The chaplain's role also includes supporting staff. It is therefore important that colleagues, employers, and commissioners have confidence that healthcare chaplains are properly trained and meet the required standards.</p> |

Assessment against the Standards

Standard One: Eligibility and 'public interest test'

Summary

The UKBHC registrants provide healthcare chaplaincy. The UKBHC explains on their [website](#) that 'Today chaplains are employed by the NHS and other healthcare organisations for their expertise in providing spiritual, pastoral, and religious care. Chaplains come from many different traditions and faiths but are united by their compassionate concern to support those who are challenged by illness and injury whether they are patients or their carers.' The role of chaplains is focused on the spiritual and religious domains, the way these relate to health and wellbeing, and how they can enable people to cope with the challenges and transitions that accompany illness, injury, and suffering.

We completed our Standard One assessment⁵ in March 2023. We found that the UKBHC's register falls within the scope of the Accredited Registers programme. We considered that the healthcare chaplaincy by the UKBHC registrants can be beneficial. We found it is in the public interest to have registers of practitioners who meet appropriate standards of competence, conduct, and business practice, as required by the UKBHC.

Consequently, we found that Standard One was met. We issued the following recommendations:

- Recommendation One: The UKBHC should review and update its Risk Matrix to ensure that the safeguarding risks and mitigations are properly captured and that the scores fully reflect the risk.
- Recommendation Two: The UKBHC should consider developing a policy/procedure about how it as an organisation would handle a safeguarding concern it became aware of through its register functions.

We did not identify any new information that could affect Standard One being met, during this renewal assessment. We have considered whether these Recommendations have been considered, under the relevant Standards 2-8.

⁵ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-supplementary-guidance-for-standard-one.pdf?sfvrsn=3e5f4920_6

Standard 2: Management of the register

Summary

The Accreditation Panel found that Standard Two was met. It issued the following Conditions and Recommendations:

Conditions:

- Condition 1: The UKBHC must clarify the basis for its position on whether or not membership of an organised religious or faith group is a requirement of registration. This must be completed within six months.
- Condition 2: The UKBHC must develop and publish an appeals process for registration decisions. This must be completed within six months.
- Condition 3: The UKBHC must develop mechanisms to check for relevant disciplinary outcomes from accredited registers and other regulatory bodies for applicants or registrants. This must be completed within six months.

Recommendations(s):

- Recommendation 1: UKBHC should set out the minimum level of CPD that is acceptable.
- Recommendation 2: The UKBHC should consider updating the restoration policy to include information for restoring registrants to the register following breaks that aren't due to disciplinary actions, such as parental leave.

Accreditation Panel findings

2.1 At the time of assessment, the UKBHC offers two categories of registration: full registration, and student or provisional registration; based on the level of expertise and suitability for practice. Both categories are practicing chaplains since provisional registrants are in the process of completing their postgraduate qualifications.

2.2 Practitioners applying to join the UKBHC's register are required to show evidence of a recognised or accredited status within a mainstream faith community or belief group, which can also include from the Humanist Society. The UKBHC told us that they will be reviewing whether this requirement should remain. We think it is important that the UKBHC has a clear basis for the requirement.

2.3 The Accreditation Panel issued the following Condition:

- Condition 1: The UKBHC must clarify the basis for its position on whether or not membership of an organised religious or faith group is a requirement of registration. This must be completed within six months.

2.4 The UKBHC website does not have a clear process that outlines the equivalency process. We noted that potential applicants might have difficulty finding information relating to the equivalence route. We have issued the condition in Standard Four.

2.5 The UKBHC does not currently have an appeals process in place for registration decisions. We were concerned that this would prevent an applicant who is refused registration from raising a challenge to the decision.

2.6 The Accreditation Panel issued the following Condition:

- Condition 2: The UKBHC must develop and publish an appeals process for registration decisions. This must be completed within six months.

2.7 The UKBHC's Registrar monitors compliance with the Continuing Professional Development (CPD) practice and conducts audit of annual renewals to assure that registrants are meeting CPD, in line with their [requirements](#). This guidance states that registrants may be removed from the register if they do not comply. We noted however that no guideline was provided on the minimum number of hours of CPD.

2.8 The Accreditation Panel issued the following Recommendation:

- Recommendation 1: UKBHC should set out the minimum level of CPD that is acceptable.

2.9 The UKBHC sets out the process for considering applications for readmission and restoration to the register in its [restoration policy \(2017\)](#). At least three people will make up the Restoration Committee: a Chair, a lay member, and a chaplain registered with the UKBHC. The policy currently focuses on breaks after non-compliance and disciplinary action. We suggest that the UKBHC clarifies its policies in relation to other types of breaks, such as parental leave.

2.10 The Accreditation Panel issued the following Recommendation.

- Recommendation 2: The UKBHC should consider updating the restoration policy to include information for restoring registrants to the register following breaks that aren't due to disciplinary actions, such as parental leave.

2.11 We noted that registrants may be registered with other bodies in addition to the UKBHC. The UKBHC's register has a separate section for details of dual

memberships and provides links to other organisations such as regulators or other accredited registers that registrants may belong to.

2.12 The registration criteria include a requirement for "no known existing issues with professional conduct." The UKBHC acknowledged that it does not yet have a formal procedure for recognising decisions regarding professional conduct made by regulatory bodies and other accredited registers. It advised us that this will be included in its new registration process. This is particularly relevant for registrants who have one or more additional registrations.

2.13 The Accreditation Panel issued the following Condition:

- Condition 3: The UKBHC must develop mechanisms to check for relevant disciplinary outcomes from accredited registers and other regulatory bodies for applicants or registrants. This must be completed within six months.

2.14 The UKBHC operates a public register for healthcare chaplains. Their register is published at: [The UKBHC Register](#). The register displays registrants' names, status, current post, and specialist area of practice. The specialisation field of practice was not specified for a few registrants.

2.15 Although the UKBHC's register includes most of the fields that we would expect, the Unique Identifiers (UIDs) used by UKBHC internally are not published. This helps to avoid confusion if registrants have the same, or similar names and will support the sharing of disciplinary outcomes with other regulatory bodies. As part of the new website, the UKBHC must include Unique Identifiers (UID)s on the register to help people distinguish between two registrants with similar or the same names.

Standard 3: Standards for registrants

Summary

The Accreditation Panel found that Standard Three was met. It issued the following Conditions.

Conditions:

- Condition 4: The UKBHC must develop formal agreements for its registrants to ensure that there is a clear basis for the full range of registrant requirements, beyond the Code of Conduct. This must be completed within six months.
- Condition 5: The UKBHC should develop a safeguarding policy that sets out its role and responsibilities in relation to safeguarding concerns. Its codes, registration, and complaint procedures should integrate with this

and make clear what the expectations for registrants are in terms of safeguarding. This must be completed within three months.

- Condition 6: UKBHC should set explicit requirements for registrants to hold appropriate indemnity cover (whether that be through a membership organisation, employer, or other means). This must be completed within six months.

Accreditation Panel findings

i. Standards of Competence

3.1 The UKBHC set out its standards for technical competence in the [Healthcare Chaplaincy Bands and Duties Framework \(2015\)](#) and [Spiritual and Religious Care Capabilities and Competences \(2015\)](#).

3.2 We noted that there is no formal contract or agreement defining the terms and conditions of registration. The UKBHC informed us that registrants must complete a pro-forma document agreeing to abide by the UKBHC Code of Conduct. Although the Codes reflect the general conduct of chaplains, for example the registrant responsibility for maintaining relationships between chaplains and those in their care, personal and professional boundaries, they do not make explicit other requirements such as compliance complaints processes.

3.3 The Accreditation Panel issued the following Condition:

- Condition 4: The UKBHC must develop formal agreements for its registrants to ensure that there is a clear basis for the full range of registrant requirements, beyond the Code of Conduct. This must be completed within six months.

3.4 As set out in Standard One the nature of the work of chaplaincy and the likelihood of close contact with children and vulnerable adults highlight the importance of having clear and robust safeguarding policies. This also underlines the need for the UKBHC to be accessible by phone as well as by email for the reporting of urgent concerns.

3.5 We found that the following Recommendation issued under Standard One in March 2023 did not appear to have been considered.

- Recommendation (Standard one): The UKBHC should consider developing a policy/procedure about how it as an organisation would handle a safeguarding concern it became aware of though its register functions.

3.6 However, the UKBHC told us that they are in the process of appointing an officer for safeguarding concerns. We are escalating it because a) there's no evidence

they've considered the recommendation and b) there is a broader concern about their safeguarding arrangements resulting in us issuing a Condition.

3.7 The Accreditation Panel issued the following Condition:

- Condition 5: The UKBHC should develop a safeguarding policy that sets out its role and responsibilities in relation to safeguarding concerns. Its codes, registration, and complaint procedures should integrate with this and make clear what the expectations for registrants are in terms of safeguarding. This must be completed within three months.

ii. **Standards of conduct**

The UKBHC's [Code of Conduct 2014](#) sets professional and ethical requirements for registrants, including accountability, honesty, openness, integrity, respect, and the professional duty of candour.

iii. **Standards of business practice**

The UKBHC's Code of Conduct requires registrants to respect confidentiality and set its expectations for information sharing.

We checked if registrants are required to hold indemnity insurance. The UKBHC advised that some registrants are also members of the College of Healthcare Chaplains and would have indemnity through that membership. The UKBHC will review this requirement at their December 2023 Board meeting. The Accreditation Panel determined that it is important to ensure that all registrants have appropriate indemnity insurance, recognising that not all will be members of the College of Healthcare Chaplains.

The Accreditation Panel issued the following Condition:

- Condition 6: UKBHC should set explicit requirements for registrants to hold appropriate indemnity cover (whether that be through a membership organisation, employer, or other means). This must be completed by the time of its next assessment.

Standard 4: Education and training

The Accreditation Panel found that Standard Four was met. It issued the following Condition and Recommendation.

Condition:

- Condition 7; The UKBHC should develop a process for how it assures the quality of the education courses it accredits for entry into its register and assess applications for registration from people who have not

qualified through one of its approved education providers. This must be completed by the time of its next assessment.

Recommendation:

- Recommendation 3; The UKBHC should provide information about its requirements in terms of curricula for the courses that lead to entry into the register.

Accreditation Panel findings

4.1 The UKBHC registers full-registration chaplains who have completed a postgraduate degree or its equivalent, at a minimum level of qualification, from a university course that the UKBHC accredits.

4.2 The UKBHC accredits five postgraduate healthcare chaplaincy programmes for Band 6 chaplaincy appointments in the UK, available in Cardiff, Cambridge, London, and Glasgow. We were not sure about the accreditation status for two courses, as currently there are seven courses listed on their website.

4.3 The UKBHC has assessed the five Chaplaincy courses meeting its requirements for training and education. Although the UKBHC told us that it has a formalised assessment process for approving courses through its academic forum, evidence was not provided during the assessment. We were therefore unable to verify the process.

4.4 The Accreditation Panel issued the following Recommendation:

- Recommendation 3: The UKBHC should provide information about its requirements in terms of curricula for the courses that lead to entry into the register.

4.5 The UKBHC does not directly provide any education course itself. It accredits courses offered by universities. We considered it is essential for the UKBHC to ensure the quality of education providers.

4.6 Chaplains wishing to join the UKBHC register must meet published minimum qualification and experience criteria. Applications are considered by the registrar against the criteria.

4.7 We noted that applicants who could not provide evidence of the required qualifications and experience could apply through an equivalence route. The UKBHC has appointed an academic advisor to consider the equivalence of academic qualifications and experience to meet the registration criteria and to advise the registrar. However, no information is published about the criteria used by the academic advisor for assessing these applications. The UKBHC should make clear to members of the public and potential applicants.

4.8 The Accreditation Panel issued the following Condition.

- Condition 7: The UKBHC should develop a process for how it assures the quality of the education courses it accredits for entry into its register and assess applications for registration from people who

have not qualified through one of its approved education providers. This must be completed by the time of its next assessment.

Standard 5: Complaints and concerns about registrations

The Accreditation Panel found that Standard Five was met. It issued the following Conditions and Recommendations:

Conditions:

- Condition 8: UKBHC should ensure that its complaints process is accessible and responsive. Its guidance for the public should be clear and up to date with correct details of key roles such as the Registrar, and support should be available by telephone as well as email. This must be completed within three months.
- Condition 9: UKBHC must publish disciplinary outcomes on its register, so that anyone checking a registrant can clearly see if a sanction has been imposed. This must be completed within six months.
- Condition 10: The UKBHC must develop its policy for reporting relevant complaint outcomes to appropriate bodies, including the Accredited Registers. It must also show evidence of how it works with the NHS and other employers to share and investigate concerns about registrants. This must be completed within six months.

Recommendations:

- Recommendation 4: The UKBHC should document the procedure for recruitment, training, and monitoring of the committees (screening, conduct and competence, health committee, and appeal) involved in the disciplinary process.
- Recommendation: The UKBHC should document its formal process for quality assuring decisions about complaints.

Accreditation Panel findings

5.1 The UKBHC's website invites people to raise any concerns about registrants through the UKBHC [Complaints Policy 2020](#). The UKBHC requires complaints to be submitted in writing using their [complaints form](#) published on the website. The Registrar administers and facilitates the process of receiving a complaint, including advising the Lead Officer.

5.2 The complaint policy sets out that complaints may be made verbally or in writing and should also be accepted via any other method, for example, the telephone or electronically. We noted that to enable this, the complaint policy should have a phone number and current key official's email addresses. UKBHC confirmed that going to publish a phone number on its new website.

5.3 The Accreditation Panel issued the following Condition:

- Condition 8; UKBHC should ensure that its complaints process is accessible and responsive. Its guidance for the public should be clear and up to date with correct details of key roles such as the Registrar, and support should be available by telephone as well as email. This must be completed within three months.

5.4 The Registrar will initiate investigations with the employer and/or the registrant's faith community or belief group. The UKBHC's policies set out that in most circumstances, it will be the employer and/or faith community or belief group who will take disciplinary action. If the issue cannot be resolved informally or calls into question the fitness to practice of the chaplain(s), formal proceedings will be initiated.

5.5 The UKBHC's website sets out how it manages fitness to practice (FTP). The UKBHC has three committees (the Screening Committee, the Conduct and Competence Committee, and the Health Committee) that deal with fitness to practice allegations.

5.6 The UKBHC has an appeals policy under which the registrant or complainant may appeal the hearing decision. An appeal should be filed within 28 days and will be heard by the Disciplinary and Appeals Committee (DAC), which consists of a chair, a UKBHC chaplain, and a layperson who has not been involved in the process.

5.7 The UKBHC employs laypeople within its disciplinary committees; each committee is composed of a chair, a professional member, and a lay member.

5.8 We were not clear about the recruitment and training procedures for committees engaged in the disciplinary process. The UKBHC told us that they support development requests, but committee members are all drawn from a group of experienced chaplains and other professionals already sitting on the board.

5.9 The Accreditation Panel issued the following Recommendation:

- Recommendation 4: The UKBHC should document the procedure for recruitment, training, and monitoring of the committees (screening, conduct and competence, health committee, and appeal) involved in the disciplinary process.

5.10 The UKBHC defines the process and timescale of publishing fitness to practice outcomes from conduct and competence committees in the [UKBHC's Disclosure Policy 2014](#).

5.11 We noted there are currently no restrictions on any registrants' practice displayed on the register, although the UKBHC confirmed that if this was the case, this would be displayed as part of their register entry. There is no dedicated webpage for FTP hearing outcomes. UKBHC confirmed that they will be developing this page as a component of the new website.

5.12 We noted that the UKBHC's disclosure policy states that registrants who have been removed from the register will not have their names displayed. The UKBHC will

keep a record of these chaplains and make them available, on request, to the UKBHC Registrar. The Accreditation Panel considered it is important that the public, and employers, are aware when registrants have been removed from the register since this may relate to disciplinary outcomes. This can be achieved by publishing the outcomes from disciplinary hearings, and having a process in place to determine when it is not appropriate to do so.

5.13 The Accreditation Panel issued the following Condition.

- Condition 9: UKBHC must publish disciplinary outcomes on its register, so that anyone checking a registrant can clearly see if a sanction has been imposed. This must be completed within six months.

5.14 The Screening Committee can issue an interim suspension order if any registrant poses a threat to public protection. The case will then be sent to either the Conduct and Competence Committee or the Health Committee, depending on the nature of the complaint.

5.15 We highlighted the need for the UKBHC to quality assure decisions about complaints. The UKBHC told us that ‘Complaints received would normally be reported to the Board’, who would identify suitable learning and actions. We suggest that formalising this approach would be beneficial.

5.16 The Accreditation Panel issued the following Recommendation.

- Recommendation 5: The UKBHC should document its formal process for quality assuring decisions about complaints.

5.17 The UKBHC did not have defined processes for informing other accredited registers or other relevant bodies, such as the police or social services, of complaint outcomes where it is in the public interest to do so. It is also not a signatory to the Accredited Registers Information Sharing Protocol, through which the registers ‘share information so as to support mutual recognition of outcomes of disciplinary proceedings that lead to removal from an AR⁶’.

5.18 We determined that having procedures in place for sharing regulatory outcomes with relevant bodies is an important part of safeguarding, as considered under Standard Three. Given that the UKBHC expects many complaints to be resolved at the employer level, this needs to include arrangements for sharing concerns with NHS bodies. The UKBHC has told us it has not considered any complaints about registrants during the past two years. This raises a question about the extent to which it is currently engaging with employers.

5.19 The Accreditation Panel issued the following Condition:

- Condition 10; The UKBHC must develop its policy for reporting relevant complaint outcomes to appropriate bodies, including the

⁶ [Accredited Registers Collaborative - The Academy for Healthcare Science \(ahcs.ac.uk\)](https://www.ahcs.ac.uk)

Accredited Registers. It must also show evidence of how it works with the NHS and other employers to share and investigate concerns about registrants. This must be completed within six months.

Standard 6: Governance

The Accreditation Panel found that Standard Six was met with Conditions. It issued the following Recommendations and Condition.

Condition

- Condition 11; The UKBHC should publish Board minutes to date (or relevant extracts as related to its public protection role) from its governance meetings to improve the transparency of its decision-making. This must be completed by the time of its next assessment.

Recommendation:

- Recommendation 6; The UKBHC should consider succession planning in business continuity plans.

Accreditation Panel findings

6.1 The UKBHC is a private limited company governed by its Articles and Standing Order. It is operated by a Board of Directors supported by committees, which include lay members. The UKBHC's focus on public protection is set out within its Standing Order.

6.2 The UKBHC provides information about its standing order, structure, and member details through the 'About' section of its website. The [standing order](#) outlines the workings of the board, which include authority, powers of the board, election, and membership of the board members. We noted that there are no separate terms of reference for committees, although information about their role is included within the standing order.

6.3 The UKBHC informed us that its governance review is currently in progress and new governance arrangements will be updated. This will include updating its business continuity plan. We noted that the UKBHC is run by a small number of volunteers, and therefore it may wish to consider succession planning as part of this.

6.4 The Accreditation Panel issued the following Recommendation:

- Recommendation 6; The UKBHC should consider succession planning in business continuity plans.

6.5 Up until June 2020, Board minutes could be accessed on the UKBHC website. The UKBHC told us that the minutes of each board meeting would be accessible on the new website.

6.6 The Accreditation Panel issued the following Condition:

- Condition 11: The UKBHC should publish Board minutes to date (or relevant extracts as related to its public protection role) from its governance meetings to improve the transparency of its decision-making. This must be completed by the time of its next assessment.

Standard 7: Management of the risks arising from the activities of registrants

The Accreditation Panel found that Standard Seven was met. It issued the following Condition and Recommendation:

Condition

- Condition 12: The UKBHC should review and update its Risk Matrix to ensure that the safeguarding risks and mitigations are properly captured and that the scores fully reflect the risk. This must be completed within three months.

Recommendations:

- Recommendation 7; The UKBHC should document the risk management process.
- Recommendation 8; The UKBHC should expand the information it provides about the knowledge base for chaplaincy.

Accreditation Panel findings

7.1 As set out for Standard One, the UKBHC manages a risk register that covers potential risks arising from registrants' professional practice. The risk register is reviewed by the UKBHC's board on a regular basis.

7.2 We assessed how the UKBHC mitigates risks relevant to the practice of its registrants' work within our assessment of Standard One, published in March 2023. We issued the following recommendation:

- Recommendation (Standard one): The UKBHC should review and update its Risk Matrix to ensure that the safeguarding risks and mitigations are properly captured and that the scores fully reflect the risk.

7.3 We found that this had not been considered. The Accreditation Panel decided to reissue this as Condition 12, which will also support the Condition 5 issued under Standard Three on safeguarding.

7.4 We also thought that it would be beneficial for the UKBHC's risk management procedures to be documented. The UKBHC told us that this will be considered at its Board meeting in December 2023.

7.5 The Accreditation Panel issued the following Recommendation:

- Recommendation 7: The UKBHC should document the risk management process.

7.6 We checked if the UKBHC's website offered clear and accessible information about the limitations and benefits of treatments offered by roles registered. Although some information is provided, we considered that this could be expanded on to support informed decision making by the public. We noted UKBHC's intentions to include more information about the knowledge base for chaplaincy on its new website.

7.7 The Accreditation Panel issued the following Recommendation:

- Recommendation 8: The UKBHC should expand the information it provides about the knowledge base for chaplaincy.

Standard 8: Communications and engagement

The Accreditation Panel found that Standard Eight was met. It issued the following Recommendations:

Recommendations:

- Recommendation 9; As part of its website redevelopment, review content to ensure that it is up to date, clear, and accessible. Key information about the register, complaints process and complaints outcomes should be easy to find.
- Recommendation 10: The Accreditation Quality Mark should be displayed on the UKBHC website.
- Recommendation 11: The UKBHC should explore options for considering views and involving the public and service users in what they do.

Accreditation Panel findings

8.1 The UKBHC's website provides information about the role of chaplains, its register, and registration criteria. A 'Raising Concerns' section and key pages such as 'View the Register' are easily accessible. As discussed in earlier standards, we considered that some information could be made available to the public to assist transparency, such as the registration equivalence route. The UKBHC has told us that it is working on a new website to improve information accessibility and is committed to launching it by spring 2024.

8.2 Within previous standards, we considered that areas of the UKBHC's website should be improved to better communicate the register and its requirements, including FTP outcomes. These resulted in the conditions and recommendations listed in the relevant standard. While updating the website, UKBHC should consider improvements recommended during this and previous assessments. It may wish to consider user testing to help achieve this.

8.3 The Accreditation Panel issued the following Recommendation:

- Recommendation 9: As part of its website redevelopment, review content to ensure that it is up to date, clear, and accessible. Key information about the register, complaints process and complaints outcomes should be easy to find.

8.4 The UKBHC engages with UK professional associations, international chaplaincy organisations, different faith communities and belief groups in the UK, as well as academic institutions. The UKBHC promotes collaboration through provisions in standing orders to protect the health, safety, and well-being of the public.

8.5 Although the UKBHC provides information about accreditation on its website, we could not see the Accreditation Quality Mark. We encourage the use of the quality mark to increase credibility and make it easier for the public to recognise qualified practitioners and accredited registers. The quality mark represents commitment to high standards in professional practice.

8.6 The Accreditation Panel issued the following recommendation:

- Recommendation 10: The Accreditation Quality Mark should be displayed on the UKBHC website.

8.7 The UKBHC informed us of their involvement National Health Service in England (NHSE), and chaplaincy forum participation. We weren't clear how the UKBHC solicits feedback from its service users and other stakeholders.

8.8 The Accreditation Panel issued the following Recommendation:

- Recommendation 11: The UKBHC should explore options for considering views and involving the public and service users in what they do.

Share your experience.

9.1 We did not receive any responses to the invitation to share experience of the UKBHC.

Impact assessment (including Equalities impact)

10.1 We carried out an impact assessment as part of our decision to renew accreditation of the UKBHC. This impact assessment included an equalities

impact assessment as part of the consideration of our duty under the Equality Act 2010.

- 10.2 At time of assessment, we have introduced our new Standard for Accredited Registers: Standard Nine: Equality, Diversity, and Inclusion.⁷ In this assessment, we will check how, for example, the UKBHC acts to ‘understand the diversity of its registrants, service users and complainants and has an awareness of issues that may impact those with protected characteristics as defined by the Equality Act 2010.’⁸ We expect this to be completed by the end of March 2023, although note at the time of writing this report the UKBHC had not yet submitted its evidence.
- 10.3 As noted under Standards One, Three and Seven, chaplains’ work brings them into contact with children and vulnerable adults who may be experiencing particularly distressing situations. It is therefore essential that the UKBHC has clear arrangements for safeguarding. We issued Condition 5 under Standard Three to develop a safeguarding policy, to address this.
- 10.4 As noted under Standard Two, at the time of the assessment, the UKBHC told us that it is looking into whether it should accept applications from people with no faith. We have issued Condition 1, to require the UKBHC to update us when it has come to a decision.
- 10.5 Overall, the Accreditation Panel determined that accreditation would have a positive impact for service users, through consistency of standards of chaplaincy. However, this is dependent on meeting the Conditions issued through this report within the timeframes.

⁷ [Standards for Accredited Registers 2023 \(professionalstandards.org.uk\)](https://www.professionalstandards.org.uk)

⁸ [Equality Act 2010: guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk)