

Accredited Registers

Targeted Review – British Association of Counselling and Psychotherapy (BACP)

Report of Accreditation Panel: 23 January 2024

1. Outcome

- 1.1 The Accreditation Panel renewed accreditation with a Condition for the BACP¹ following a targeted review focusing on Standards Two to Six, and Eight.
- 1.2 We found that Standards Two, Five, Six and Eight were met. Standards Three and Four were met with the following Conditions, which are to be completed within three months of the publication of this report:
 - **Condition One:** The BACP should obtain an independent, authoritative review of its Good Practice in Action (GPiA) 042 [*Working with suicidal clients in the counselling professions*] by someone who is not an author of the report, to ensure that it fully aligns with NG225 [*Self-harm: assessment, management and preventing recurrence*]².
 - **Condition Two:** The BACP should disseminate its updated GPiA 042 and supporting guidance to registrants.
 - **Condition Three:** The BACP must demonstrate that it has informed its education and training providers of the need to include the underpinning evidence base (as set out in NG225) in teaching on suicide risk assessment and that self-assessment risk assessment tools are unable to accurately predict suicide.
- 1.3 We also issued the following Recommendation:
 - **Recommendation One:** The BACP should consider how to make clearer that the remit of the Accreditation Quality Mark only extends to registrants working within the UK, and how adjunctive therapies are presented.
- 1.4 We will check how the BACP has considered the Recommendation at its next assessment.

2. Background

The Process

- 2.1 We conduct an annual check for each Accredited Register. This is used to monitor whether there have been any significant changes to key processes or significant concerns raised that could affect whether the *Standards for Accredited Registers* (the Standards)³ continue to be met.
- 2.2 In some cases, where we need further information or where we have concerns, an annual check will be escalated to a targeted review of the Accredited

¹ BACP website: <https://www.bacp.co.uk/>

² <https://www.nice.org.uk/guidance/ng225>

³ [Standards for Accredited Registers 2023 \(professionalstandards.org.uk\)](https://www.professionalstandards.org.uk)

Register. A targeted review consists of a more in-depth assessment of specific Standards.

- 2.3 Following a targeted review, an Accreditation Panel considers whether the Standard(s) continue to be met. The Accreditation Panel may issue Recommendations or Conditions. In serious cases, it may consider suspending or withdrawing accreditation.
- 2.4 More information about the annual check and targeted review assessment process for existing Accredited Registers is set out in our *Accredited Registers - guidance on renewing accreditation*.⁴

The BACP

- 2.5 The BACP is a company limited by guarantee (company number 02175320), and charity (Charity Commission registration 298361) registered in England and Wales. It registers counsellors and psychotherapists. As of 1 January 2024, there were 52,017 people on the BACP's Accredited Register.

The BACP's annual check

- 2.6 The annual check involved a:
- review of information provided to the team by the BACP in its annual check form, submitted in July 2023.
 - review of 'Share Your Experience' submissions received since the last review.
 - check of the BACP's register.
 - review of the actions taken to address Recommendations issued at the previous annual review.
- 2.7 We found that we required additional information to decide about Standards Two to Six, and Eight. The rest of this report discusses our targeted review against these Standards.

3. Assessment against the Standards

Standard Two – Management of the register

Summary

- 3.1 The Accreditation Panel found that this Standard continued to be met.

Reasons for Targeted Review

- 3.2 We noted that the BACP provides a direct link to the 'find a therapist' tool from the homepage, and once this has been accessed, there is a link to the register, but the register itself is not accessed from the homepage making it difficult to find. It isn't clear if all practitioners on the 'find a therapist' tool are registered and therefore included on the Accredited Register. We also noted that it wasn't clear that some registrants who are based outside the UK are not covered by the programme.

⁴ [annual-review-process-guide.pdf \(professionalstandards.org.uk\)](#)

- 3.3 The register is published on the website and contains the registrants name, member ID (unique number), their location and status. There is currently no information about the qualifications required to be registered on the register webpage. On the register, where registrants have chosen to also be included on the 'find a therapist' tool, their name also acts as a link to their directory entry on the 'find a therapist' tool. Where a registrant is under sanction, the word 'sanction' is added next to their name on the register, this acts as a link to the sanction notice. Sanctions are also noted on the 'find a therapist' tool. We noted that the register does not explain all the terms on the register such as 'Registered Member MBACP, Registered Member MBACP (Accred) or Registered Member MBACP (Snr Accred)'.
3.4 We did not find any gaps or errors in the register; we did however note that one of the entries on the 'find a therapist' tool discusses the use of shamanism in their therapy.

The Accreditation Panel's findings

- 3.5 The Accreditation Panel considered that broadly, the information provided on the published Register meets our requirements for Standard Two.
3.6 We considered the inclusion of 'shamanism' on a registrant's register entry and how this might fit with broader counselling and psychotherapy approaches. As part of our Standard one assessment, we had asked the BACP about spiritual psychotherapy. BACP had stated that 'The term 'spiritual psychotherapy' would suggest that the therapist has a familiarity with different spiritual beliefs and is comfortable with such language and concepts, and thus able to meet the client in their world view/frame of reference. In itself, it is not a modality but could be used alongside other modalities'. The Accreditation Panel was satisfied with this approach but thought that it might be beneficial for the public if the BACP considered how to make clearer its approach to additional practices such as this, on its register.
3.7 We also thought that the BACP should be clearer on the directory and register webpages that the remit of the Accredited Register is the UK only.
3.8 We issued the following Recommendation:
- **Recommendation One:** The BACP should consider how to make clearer that the remit of the Accreditation Quality Mark only extends to registrants working within the UK, and how adjunctive therapies are presented.

Standard Three – Standards for registrants

Summary

- 3.9 The Accreditation Panel found that this Standard is met with Conditions:
- **Condition One:** The BACP should obtain an independent, authoritative review of its Good Practice in Action (GPiA) 042 [*Working with suicidal clients in the counselling professions*] by someone who is not an author of the report, to ensure that it fully aligns with NG225 [*Self-harm: assessment, management and preventing recurrence*].

- **Condition Two:** The BACP should disseminate its updated GPiA 042 and supporting guidance to registrants.

Reasons for Targeted Review

- 3.10 National Institute for Health and Care Excellence (NICE) publishes evidence-based recommendations for the health and social care sector within England and Wales, developed by independent committees, including professionals and lay members, and consulted on by stakeholders. NICE guidance is relevant for people working both in the NHS, and the independent sectors. In September 2022, NICE published *Self-harm: assessment, management and preventing recurrence* (NG255).
- 3.11 NG255 covers assessment, management and preventing recurrence for children, young people and adults who have self-harmed. It includes several 'do not use' guidelines for risk assessment tools and scales, including:
- '1.6.1 Do not use risk assessment tools and scales to predict future suicide or repetition of self-harm.
 - 1.6.3 Do not use global risk stratification into low, medium or high risk to predict future suicide or repetition of self-harm.'
- 3.12 We considered whether the BACP's own guidance in this area, including its *Working with suicidal clients in the counselling professions* (GPiA 042, November 2022), reflected NG255. We noted that while GPiA 042 included reference to guidance and research warning against the reliance on risk assessment tools when working with people at risk of suicide due to a lack of validity, it did not reference NG255. We were unclear whether the references within GPiA 042 to use of risk assessment fully aligned with NG225. This raised a concern about whether the BACP's guidance was sufficiently clear about the need to not use risk assessment tools and scales, or global risk stratification into low, medium or high risk, to predict future suicide or repetition of self-harm.

The Accreditation Panel's findings

- 3.13 The Accreditation Panel noted that the BACP was in the process of updating GPiA 042 and supporting written resources, and that these would be published at the end of January 2024. The Accreditation Team has since reviewed the final versions of these documents, which are available to registrants on the BACP's website. The BACP planned to update its video resources by the end of July 2024.
- 3.14 The Accreditation Panel noted that NG255 was prompting a broader, system-wide change and that the BACP was engaging with NHS England on the best way to approach this. It also noted that not all Accredited Registers have specific guidance on this area.
- 3.15 The revised version of GPiA 042 includes reference to NG255. It includes clear reference to the 'do not use' guidance concerning use of risk assessments and scales, and global risk stratification, to predict future suicide or risk of self-harm. However, it still includes some references to use of scales, for example 'offering a 0-10 scale...can help in the process of understanding the immediacy of risk'.

It also refers to the decision making that could follow from the score of such a scale being high.

- 3.16 Given the importance of suicide prevention and the BACP's role in helping make sure that registrants practise in line with clinical guidelines, we have issued the following Condition:
- **Condition One:** The BACP should obtain an independent, authoritative review of its Good Practice in Action (GPiA) 042 [*Working with suicidal clients in the counselling professions*] by someone who is not an author of the report, to ensure that it fully aligns with NG225 [*Self-harm: assessment, management and preventing recurrence*].
 - **Condition Two:** The BACP should disseminate its updated GPiA 042 and supporting guidance to registrants.

Standard Four – Education and training

Summary

- 3.17 The Accreditation Panel found that this Standard is met, with the following Condition:
- **Condition Three:** The BACP must demonstrate that it has informed its education and training providers of the need to include the underpinning evidence base (as set out in NG255) in teaching on suicide risk assessment and that self-assessment risk assessment tools are unable to accurately predict suicide.

Reasons for Targeted Review

- 3.18 We had received a concern about gaps in training which could result in a registrant not being equipped to recognise common mental health pathologies. We also considered whether the need to recognise NG255 was embedded within the approach taken by the BACP's course providers.

The Accreditation Panel's findings

- 3.19 BACP confirmed that recognising different mental health pathologies and knowing when a practitioner needs to refer a client onto another service is covered in education and training that is affiliated with BACP. We reviewed examples of the BACP's Course Accreditation Scheme and core curricula which supported this. The Accreditation Panel was satisfied with the arrangements the BACP has in place to make sure training equips registrants to recognise common mental health pathologies.
- 3.20 The BACP confirmed that it will be informing its course providers in Quarter one of 2024 of the requirement to comply with NG255, and of how the BACP will assess compliance. This will be supplemented by a written communication following the meeting. BACP stated that 'From April 2024 onwards we will integrate questions relating to the NICE guidance [NG255] into the renewal paperwork to ensure that providers have to demonstrate their compliance.' The Accreditation Panel noted this positively, but decided that given the importance of implementing NG255, to issue a Condition requiring the BACP to update on the completion of this action and how it will ensure ongoing compliance.

- **Condition Three:** The BACP must demonstrate that it has informed its education and training providers of the need to include the underpinning evidence base (as set out in NG255) in teaching on suicide risk assessment and that self-assessment risk assessment tools are unable to accurately predict suicide.

Standard Five – Complaints against registrants

Summary

3.21 The Accreditation Panel found that this Standard continued to be met.

Reasons for Targeted Review

- 3.22 From the Share Your Experience we received about BACP, six registrants and seven complainants raised concerns about the BACP’s processes for handling complaints about registrants. Key themes included communications and timeliness.
- 3.23 We noted that the number of complaints received through the BACP’s Article 12.6 procedure had increased from 76 in 2021, to 152 in 2022. Article 12.6 is for dealing with complaints received from a third party (i.e. not someone who has received a service from a BACP registrant directly). The BACP’s guidance on Article 12.6⁵ sets out that ‘it is a discretionary procedure reserved for very serious allegations and requires a higher burden of proof than the Professional Conduct Procedure; with the only sanction available being termination of membership if a complaint is upheld’.

The Accreditation Panel’s findings

3.24 BACP provided the following data on its timelines for its complaints handling:

Route	Average length of time (weeks)	Shortest (weeks)	Longest (weeks)
Article 12.6	13	8	24
Practice Review Track	37	20	72
Disciplinary Proceedings track	36	20	72
Consensual Disposal	32	24	36

3.25 The BACP’s target timeframes for dealing with complaints are published on its website⁶. This includes a total of 12 to 18 months if a complaint progresses to a disciplinary hearing proceeding. The BACP stated that it was currently dealing with several that exceeded this timeframe, and that ‘these cases are being actively managed and it is a priority for the Registrar to work with internal staff, all parties to the complaint and their representatives to ensure the cases are

⁵<https://www.bacp.co.uk/media/18198/bacp-article-126-procedure-june-2023.pdf>

⁶ [bacp-timeframes-for-processing-complaints-mar21.pdf](#)

concluded swiftly whilst ensuring we uphold the processes set out in line with our published procedure.’

- 3.26 The Accreditation Panel noted that external factors, such as the need to receive information from other parties, can cause delay in resolving complaints, and that the BACP appeared to be focused on closing longer cases swiftly. Overall, in comparison with the statutory regulators that are of a comparable size to the BACP, the timeframes for dealing with complaints appear to be reasonable.
- 3.27 BACP told us that it has introduced an audit of complaints outcomes from January 2024 as a way of quality assuring its complaints handling process. Under this process, the BACP will undertake monthly audits of case assessor decisions. Themes, opportunities for improvement, general comments will be captured in a twice-yearly report which will be shared with BACP’s Public Protection Committee (PPC). The Independent Assessment Committee (IAC) will also undertake a biannual audit, with findings also reported to the PPC.
- 3.28 We asked the BACP whether it had any insight into the reason for the increase in the number of Article 12.6 cases. The BACP told us that due to the relatively small numbers, it has not identified any themes.
- 3.29 The BACP is due for a full renewal assessment in 2024/25. As part of this, we will undertake an audit of its complaints handling. This will allow us to look in greater depth at factors that could affect timeliness. We will also expect the BACP to have identified potential themes or drivers if Article 12.6 cases continue to increase. We will also look at how the new audit approach is working, including how the BACP decides which areas of its process to focus on, and how it analyses the results.
- 3.30 We considered whether the BACP would accept a complaint from someone acting on behalf of someone who is deceased. The BACP confirmed that this would be considered through 1.5 of its Professional Conduct Procedure⁷. This allows for the Registrar to determine ‘if, in the opinion of the Registrar, the conduct of a Member is such that it would be in the public interest for the conduct of that Member to form the basis of a complaint, the Association may prepare and submit a complaint pursuant to this Procedure’.
- 3.31 There are some differences in terms of how complaints are handled under 1.5, compared with the route in which complaints brought by people who have received a service from a BACP registrant, are considered (1.4 of the process). For example, the person will not have the same direct involvement with the case proceedings, unless the BACP decides to share relevant information.
- 3.32 The Accreditation Panel noted that this might feel unsatisfactory to the person raising the complaint but recognised that the BACP would also need to consider factors such as consent, when deciding what to take forward. The main purpose of the complaints process is to ensure that concerns can be considered in a fair, and independent way and the BACP had demonstrated that it had a route for this type of complaint.

⁷ <https://www.bacp.co.uk/media/5488/bacp-professional-conduct-procedure-feb19.pdf>

Standard Six – Governance

Summary

- 3.33 The Accreditation Panel found that this Standard continued to be met.

Reasons for Targeted Review

- 3.34 The BACP has made several changes to its governance, and senior leadership in the past year. At the time of its assessment, it had several vacancies within its governance structures, including its Board. We received concerns about this, through Share Your Experience. We were also aware of an open letter sent to Trustees and Senior Staff of BACP and circulated on social media which raised concerns about the impact these changes might have on registrants. We also became aware of comments made about the BACP in anonymous social media posts that raised concerns about the leadership, organisational culture and governance of the BACP.
- 3.35 On 27 October 2023, the BACP's Chair published a statement about the removal of Professor Kate Smith from the Board of Trustees⁸. This notes that in the interest of protecting confidentiality, it will not provide further comment on the reasons for this. On 31 October 2023 the BACP announced that it was launching an independent investigation into the social media comments⁹.

The Accreditation Panel's findings

- 3.36 The Accreditation Panel considered the BACP's approach to the independent investigation with it. It noted that although the investigation had not yet concluded, the BACP had committed to sharing any learnings with the PSA, in the form of an action plan. We also noted that the BACP also planned to respond to the open letter.
- 3.37 The Accreditation Panel noted that the BACP had now recruited additional members to the Board and PPC, and that there were enough members for each to be quorate. There was therefore no risk of delay to decision making that could affect public protection matters. The substantive Chief Executive post has also been filled.
- 3.38 The Accreditation Panel determined that the current approach by the BACP in terms of investigating concerns raised by staff and registrants appeared appropriate, but that it would be important to check for any undue delays in the finalisation of the independent investigation.

Standard Eight – Communications

Summary

- 3.39 The Accreditation Panel found that this Standard continued to be met.

Reasons for Targeted Review

⁸ [27 October: Statement about our Board of Trustees - BACP - British Association for Counselling & Psychotherapy](#)

⁹ <https://www.bacp.co.uk/news/news-from-bacp/2023/31-october-our-response-to-social-media-comments-made-about-bacp/>

- 3.40 We had received concerns through SYE about the transparency and engagement of BACP with members about the Scope of Practice and Education (SCoPEd) project. SCoPEd is a joint initiative by the BACP and five other Accredited Registers that seeks to map out the core training, practice and competence requirements for counsellors and psychotherapists working with adults¹⁰. As noted under Standard Five, we also received concerns about communications with those involved in the complaints process, through SYE. This included how it handles sensitive communications.

The Accreditation Panel's findings

- 3.41 The Accreditation Panel noted that the BACP published information about SCoPEd. We would expect the BACP to tell us about how the implementation might affect the *Standards for Accredited Registers* through our Notification of Change process. This will be an opportunity for us to review its communications on this area in greater depth. There were no issues that the Accreditation Panel thought required immediate consideration.
- 3.42 BACP highlighted that since 2021, it has identified improvements to how it communicates on matters of professional conduct. This includes the launch in November 2023 of a dedicated member support service which offers an independent listening and emotional support service. This is in addition to the BACP's existing, complainant listening support service. Its professional conduct staff team have now received safeguarding training and professional conduct staff have also received guidance and support on the tone and timeliness of communications to all parties involved in a complaint.
- 3.43 We will include consideration of these improvements when we audit the BACP's complaints processes as part of its full renewal assessment in 2024/25.

4. Impact assessment

- 4.1 The changes that the BACP has made to GPiA042 should help ensure improve care for people who have, or are considering, self-harm and/or suicide. As set out through Condition One above, we think this approach could be enhanced by seeking an independent, authoritative review of the guidance.

¹⁰ [SCoPEd framework \(bacp.co.uk\)](https://www.bacp.co.uk)