

Accreditation renewal report

Standards 1-8

British Association of Counselling and Psychotherapy

February 2025

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About accreditation

The Professional Standards 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).

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 our Standards for Accredited Registers¹ (“the Standards”) and our minimum requirements for the Standards as set out in our Evidence framework². More about how we assess against Standard One can be found in our Supplementary Guidance for Standard One³.

We used the following in our assessment of the BACP:

- Documentary review of evidence of benefits and risk supplied by the BACP and gathered through desk research
- Documentary review of evidence supplied by the BACP and gathered from public sources such as its website
- Due diligence checks
- Share your experience responses
- Observation of a Board Meeting on 21 June 2024.
- Assessment of BACP’s complaints procedures.

¹ [Standards for Accredited Registers | PSA](#)

² [Standards for Accredited Registers | PSA](#)

³ [Accredited Registers Resources | PSA](#)

The Outcome

The Accreditation Panel met on 18 December 2024 to consider the British Association for Counselling and Psychotherapy (BACP). The Panel was satisfied that the BACP could meet with Conditions all the Standards for Accredited Registers.

We therefore decided to accredit the BACP with the following Condition.

We noted the following positive findings :	
<ul style="list-style-type: none"> • The BACP publish a substantial amount of information on their website, including key processes and support available for both registrants and members of the public. • The BACP’s website is easy to navigate, written in plain English, and has considered accessibility. • The BACP have worked to address previous areas of concern, which have received public attention. • The BACP have worked to rectify concerns previously raised by the PSA (particularly in relation to Standard Five) and are continuing improvement in this area. 	

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

Conditions		Deadline
Standard Seven	Condition One: The BACP must provide clear information about the limitations of treatment offered by their registrants.	Next Annual Assessment

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

Recommendations	
Standard Five	<p>Recommendation One: The BACP should ensure they are consistently and effectively utilising section 2.4 of their Professional Conduct Procedure (Case Manager’s Test) to resolve cases that do not meet the threshold for progression.</p> <p>Recommendation Two: The BACP should provide the PSA with an update on their work to improve the timeliness of progression of complaints about practitioners.</p>

About the Register

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

Name of Organisation	The British Association for Counselling and Psychotherapy (BACP)
Website	https://www.bacp.co.uk/
Type of Organisation	BACP is a company limited by guarantee registered in England and Wales (company number 02175320), BACP also incorporates BACP Enterprises Ltd (company number 01064190). BACP is a registered charity in England (number 298361)
Role(s) covered	Counsellors and psychotherapists
Number of registrants	52017 (as of 1 January 2024)
Overview of Governance	<p>The BACP is managed through a Board of Governors, and four delegated sub-committees:</p> <ul style="list-style-type: none"> • Finance, Risk, Audit, Policy and Performance Committee • Public Protection Committee • Governance, Remuneration and Appointments Committee • Research Committee <p>The day-to-day management of the organisation is carried out by a Senior Management Team. BACP's Public Protection Committee (PPC) 'supports the functions of the BACP Register, including professional conduct and entry and maintenance of registration. It holds delegated responsibility for developing the public protection strategy.' The PPC is made up of five members, three of which are lay members, and is supported by the Registrar and Assistant Registrar. It has four strategic goals:</p> <ol style="list-style-type: none"> 1. Effective Regulation 2. Effective and efficient delivery 3. Communications and engagement 4. Research
Overview of the aims of the register	<p>Information about BACP is published on its website. This webpage states that BACP's charitable objectives are to:</p> <ul style="list-style-type: none"> • 'Promote and provide education and training for counsellors and psychotherapists working in either professional or voluntary settings, whether full or part time, with a view to raising the standards of the counselling professions for the benefit of the community and in particular for those who are the recipients of counselling or psychotherapy <p>inform and educate the public about the contribution that the counselling professions can make generally and particularly in meeting the needs of</p>

	those whose participation and development in society is impaired by physical or psychological health needs or disability.
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Inherent risks of the practice

This section uses the criteria developed as part of the Authority’s *Right Touch Assurance tool*⁴ to give an overview of the work of counsellors and psychotherapists.

Risk criteria	Counsellors or psychotherapists
<p>1. Scale of risk associated with Counsellors or psychotherapists.</p> <p><i>a. What do Counsellors or psychotherapists do?</i></p> <p><i>b. How many Counsellors or psychotherapists are there?</i></p> <p><i>c. Where do Counsellors or psychotherapists work?</i></p> <p><i>d. Size of actual/potential service user group</i></p>	<p>The BACP holds a register of counsellors and psychotherapists. BACP state that ‘there are many ways of working or modalities in counselling and psychotherapy. Therapists may be trained in one approach or use techniques from different methods if they thought these would help a client’.</p> <p>The BACP have noted the following main therapies on their website:</p>

⁴ 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.

- | | | |
|--|--|---|
| | <ol style="list-style-type: none"> 1. Adlerian therapy 2. Animal-assisted therapy 3. Art therapy 4. Behavioural therapy 5. Brief therapy 6. Coaching 7. Cognitive analytic therapy (CAT) 8. Cognitive behavioural therapy (CBT) 9. Cognitive therapy 10. Creative therapy 11. Eclectic counselling 12. Emotionally focused therapy 13. Existential therapy 14. Eye movement desensitisation and reprocessing (EMDR) 15. Family therapy 16. Gestalt therapy | <ol style="list-style-type: none"> 17. Humanistic therapy 18. Integrative counselling 19. Interpersonal therapy 20. Jungian therapy 21. Neuro-linguistic programming (NLP) 22. Person-centred therapy 23. Phenomenological therapy 24. Play therapy. 25. Primal therapy 26. Psychoanalysis 27. Psychodynamic psychotherapy 28. Psychosynthesis 29. Relationship therapy 30. Solution-focused brief therapy 31. Systemic therapy 32. Transactional analysis 33. Transpersonal therapy |
|--|--|---|

Most members are UK-based (registrants work in England, Scotland, Northern Ireland, and Wales). Registrants work in NHS, private clinics, schools, local authorities, bereavement services, Employee Assistance Programmes

	<p>(EAP)'s, third sector and voluntary organisations, police, and the armed forces.</p> <p>d. The BACP estimates that each registrant sees, on average, 12 clients per week.</p>
2. Means of assurance	<p>The BACP Register includes counsellors and psychotherapists who have met BACP's standards for registration.</p> <p>The means of assurance will depend on the practise setting. For managed premises such as NHS settings and schools, there will be criminal records and other pre-employment checks required.</p>
3. About the sector in which BACP operate	<p>The BACP Therapist Directory has around 16,000 private therapists who offer services to the public. The majority of BACP's registrants work in private practice, however many are portfolio workers and may divide their time between private practice and working for employers.</p> <p>Registrants can be employed by organisations across the public, private and third sectors, including within schools, colleges and universities, the NHS, local authorities, within criminal justice settings and other organisations which provide counselling services, such as Employment Assistance Programmes and private healthcare providers.</p> <p>Mental health provision within the NHS is generally provided across four main settings: primary care, care in the community, inpatient care, and secure care. Services can broadly be categorised as adult services, children and young people's services, urgent and crisis care, and forensic services⁵. The provision of mental health services is a devolved responsibility within the UK, these categorisations tend to broadly apply across all. In England, the primary provision of psychological therapies is through NHS Talking Therapies for Anxiety and Depression⁶. In Northern Ireland, Scotland and Wales, commissioning of psychological therapies is currently led by individual local Health Boards.</p>

⁵ [The state of the NHS provider sector](#)

⁶ [NHS England » NHS Talking Therapies, for anxiety and depression](#)

	<p>A significant number of people access mental health and wellbeing support away from the NHS, this includes services provided by charities, school, college or university providers, private practitioners or EAPs for example. In some cases, this may be due to long waiting lists for talking therapies through the NHS, or because providers offering services outside of the NHS offer a wider range of therapeutic choice for service users – both in terms of the practitioners delivering therapy, the types of therapy available or the flexibility of accessing therapy at a time and place that better suits the service user. People can access private providers through signposting from an NHS GP, or by searching for one themselves⁷.</p>
<p>4. Risk perception</p> <ul style="list-style-type: none"> • <i>Need for public confidence in Counsellor or psychotherapist?</i> • <i>Need for assurance for employers or other stakeholders?</i> 	<p>As many registrants are likely to be self-employed, it is important that members of the public have confidence in the practitioners they choose to deliver therapy. Therapeutic approaches of BACP Registrants, which may not always be available as part of mainstream NHS services, makes it important that the public are aware of what to expect from practitioners. Since registrants may be working with children and/or vulnerable adults, it is important that the public can have confidence there are appropriate safeguards in place.</p>

⁷ [Private sector mental health support - Mind](#)

Assessment against the Standards

Standard One: Eligibility and 'public interest test'

Summary

- 1.1 The Accreditation Panel found it is in the public interest to accredit the BACP. The Accreditation Panel found that Standard One is met.

Accreditation Panel findings

- 1.1 We completed our Standard One Assessment for the BACP in November 2023. We found that the BACP's register falls within the scope of the Accredited Registers Programme. We considered that the work of counsellors and psychotherapists can be beneficial and found that it is in the public interest to have registers of practitioners who meet appropriate standards of competence, conduct and business practices, as required by the BACP.
- 1.2 Consequently, the Accreditation Team found that Standard One was met. We did not identify any new information that would affect Standard One being met during the assessment of Standards Two to Eight.

Standard 2: Management of the register

Summary

- 2.1 The Accreditation Panel found that Standard Two was met.

Accreditation Panel findings

- 2.2 The BACP clearly publish details required for registration onto their register. Registrants must first obtain 'individual membership' before they can then be registered into a range of different membership levels, pertaining to their qualifications and experience. The BACP clearly publishes information on their website about requirements for each of their membership categories.
- 2.3 The BACP advised us that their Membership Categories Policy sets out an applicant's right to appeal registration decisions. Applicants have the right to appeal on two grounds; firstly, that the assessment procedure had not been followed correctly, and secondly, that the application had not been fairly and properly assessed against the published criteria. The Memberships Categories Policy further sets out requirements of an appeal including timeframes and associated costs.
- 2.4 The Register Terms and Conditions set our requirements for registrants. Upon joining the register, members are asked to agree to Register Terms and Conditions. Members must again indicate their agreement at their annual renewal. To ensure that registrants remain compliant with the Register Terms and Conditions, the BACP complete an audit of 1.5% of eligible members who are renewing their membership. If called for audit, members are required to provide evidence of compliance with Register Terms and Conditions, including evidence of continuing professional development (CPD), appropriate supervision, and indemnity insurance cover. Those who fail to engage with the audit process are referred to the Professional Conduct function of the BACP.

- 2.5 The BACP requires prospective registrants to disclose if they have any disciplinary history from other professional membership bodies, any convictions which are not spent under the Rehabilitation of Offenders Act 1974 or any other factors which would call into question their suitability for membership when applying for membership with the BACP. The BACP are also signatories of the AR Information Sharing Protocol in which they share, receive and uphold outcomes of disciplinary hearings (where relevant to profession).
- 2.6 The BACP provided us with an explanation regarding their 'directory' and 'register.' BACP's Therapist Directory is an additional subscription service for registered and accredited members, which enables them to advertise their services to members of the public or training and supervision to other members or professionals. It appears to the public as an enhanced listing on the BACP Register. Only registrants can join the directory.
- 2.7 Both the Therapist Directory and the Register display a member's name, unique ID and membership status, in line with our minimum requirements. As part of our assessment, we conducted a review of the BACP's register and randomly selected and sampled register entries. The Accreditation Panel did not identify any concerns with the BACP register and are satisfied the information available is clear, and in line with our requirements of accreditation.
- 2.8 For both those on the Therapist Directory and the Register, any sanctions will clearly be displayed on their register entry. The word sanction will be visible on the members register entry, in red, and will be hyperlinked to the sanctions webpage, which contains further details. The Accreditation Panel were satisfied that any restrictions on practice are displayed clearly.
- 2.9 The BACP has adequate processes in place for updating and quality checking the register. The data for the Register is pulled automatically from the BACP's database to ensure that it always displays the most up-to-date information. For the Therapist Directory, all free text sections are checked by the BACP before being approved and uploaded onto the website. The BACP also check that the information is displaying correctly by running a monthly report. This report identifies if any information has been added to a wrong field or is missing.
- 2.10 Members who have had their registration and member removed via the professional conduct procedure or an independent panel under article 12.6 are not able to register with BACP for a period of five years. This is recorded on BACP's database. Applications by those who are ineligible for membership, which have been made during this time will be flagged and rejected. After five years members will be required to submit a new application for membership. An independent panel will then determine suitability for membership.

Standard 3: Standards for registrants

Summary

3.1 The Accreditation Panel found that Standard Three was met.

Accreditation Panel findings

3.2 All registrants are required to sign the Register Terms and Conditions as part of their continued registration with the BACP.

- 3.3 BACP also requires that all its members adhere to the standards for professional practice as set out in the Ethical Framework for the Counselling Professions. Furthermore, in 2023, the BACP formally adopted the SCoPEd Framework which sets out the core training, practice and competence requirements for counsellors and psychotherapists working with adults. Further assessment of this is being considered as under a Notification of Change assessment.
- 3.4 In terms of management of safeguarding concerns, the BACP told us they have a system and process in place for staff to raise safeguarding concerns arising in the course of the day-to-day work including mandatory training for all staff with a clear route on how to report concerns.
- 3.5 The BACP has also produced five 'Good Practice in Action' Resources that aim to support practitioner by providing general information on safeguarding principles and policies. These resources are centred around safeguarding vulnerable adults and children and young people, child protection and suicide issues when working in the counselling professions.
- 3.6 In addition to the above Good Practice in Action Resources, the BACP has produced a further 82 resources which are available to all members. These resources cover a range of topics and are intended to support practitioners by providing general information on principles and policy applicable, in the context of the core ethical principles, values and personal moral qualities of BACP.
- 3.7 The BACP has seven evidence-based competence frameworks and four training curricula which define the knowledge, skills and abilities needed for ethical and effective practice in several areas. The majority of these are aimed at already qualified practitioners and include areas such as Children and Young People competences and curriculum, Coaching, Supervision, Online and phone therapy, and further and higher education competences. Furthermore, the BACP have three 'Good Practice across the Counselling Professions' resources that aim to help develop good practice in relation to gender, sexuality and relationship diversity, counselling and psychotherapy relationships and working with disability across the counselling professions.
- 3.8 BACP's Ethical Framework for the Counselling Professions covers the areas of accountability, honesty, openness, integrity, respect and the principles of the professional Duty of Candour. All BACP members commit to complying with the Ethical Framework when they join or renew membership. This Ethical Framework is the main point of reference for decision making in professional conduct hearings. The BACP advised us that the Ethical Framework is currently under review; we look forward to being provided with updates on the progress of this review from the BACP.
- 3.9 Furthermore, the Ethical Framework requires members to comply with GDPR, including data protection, information sharing and confidentiality. The framework also requires members to ensure clients are made aware of how they can make a complaint. Under section 19 of the Ethical Framework, members must be covered by appropriate indemnity insurance. As per Standard Two, the BACP undertakes an audit of registered members who are renewing their membership, and if called upon for audit, members must provide evidence of holding appropriate insurance.
- 3.10 The Ethical Framework also requires members to be honest and accurate in their advertising about their qualifications, experience, and how they work. As part of the Terms and Conditions of membership, members agree to observe a number of formal membership policies. This includes the 'Promoting Your Membership'

Policy which specifies that the use of the PSA Quality Mark is only applicable to those within the United Kingdom.

Standard 4: Education and training

Summary

4.1 The Accreditation Panel found that Standard Four was met.

Accreditation Panel findings

- 4.2 The BACP's Course Accreditation and Approval Practitioner Qualification Schemes are informed and underpinned by the Core Curriculum, which is extracted from Towards Regulation: The Standards, Benchmarks and Training Requirements for Counselling and Psychotherapy, the QAA Counselling and Psychotherapy subjects and benchmarks and the SCoPEd Framework.
- 4.3 BACP's Course Accreditation Scheme provides quality assurance mechanisms for counselling and psychotherapy core practitioner training courses. The course accreditation assessment process includes an initial check for course eligibility against the eligibility criteria (Part A). If eligible, the application then goes forward for assessment of the course delivery criteria (Part B). A course visit forms part of this process, and two accreditation assessors attend the training to observe teaching, review student assessments and interview students, course staff and the course management team. The assessment is then moderated by an external moderator before accreditation is awarded. Accreditation is awarded for five-years, with an annual review taking place to ensure the course continues to meet the BACP's requirements.
- 4.4 BACP's Approved Practitioner Qualification Scheme requires qualification partners to ensure that students are appropriately prepared for working with issues relating to equality, diversity and inclusion. The scheme includes criteria that aim to help equip students to work ethically with the diverse communities they serve. The scheme also ensures that training about the wider health and social care system, including a practitioner's responsibility within these systems, takes place.
- 4.5 The BACP clearly display the type and level of qualification required for entry to the register. This includes completion of a course of at least one-year full time (or two-years part time) of classroom-based tuition, and completion of a supervised placement of at least 100 client contact hours. Completion of the above, will enable prospective registrants to obtain 'Individual Membership.' To obtain 'Registered Membership', Individual members must successfully complete and graduate from a BACP Accredited Course, or, by passing the Certificate of Proficiency. They must also currently be in practice or have practiced within the last three years.
- 4.6 As part of SCoPEd implementation, BACP membership eligibility requirements (above) will change slightly from 1st February 2026 to fully align BACP membership categories to the SCoPEd framework. This is being considered under a Notification of Change assessment.
- 4.7 In order to gain registration with the BACP, prospective members must already be an individual member of the BACP and currently be in practice or have

practiced within the last three years. Members must also have successfully completed and graduated from a BACP Accredited Course or have passed their Certificate of Proficiency. While the BACP does not have an equivalence process in which they accept qualifications from other bodies, their certificate of proficiency is a standardised assessment of the skills, knowledge and abilities required to be a professional counsellor or psychotherapist. Successful completion of the Certificate of Proficiency assessment, coupled with the requirement for individual membership (which requires members to provide evidence of their qualification) ensure that those who are admitted to the BACP as registered members have the minimum level of competence that clients have a right to expect. We are satisfied that the Certificate of Proficiency assessment is a mechanism for considering alternative experience.

Standard 5: Complaints and concerns about registrations

Summary

5.1 The Accreditation Panel found that Standard Five was met. It issued the following Recommendations.

Recommendations:

- **Recommendation One:** The BACP should ensure they are consistently and effectively utilising section 2.4 of their Professional Conduct Procedure (Case Manager's Test) to resolve cases that do not meet the threshold for progression.
- **Recommendation Two:** The BACP should provide the PSA with an update on their work to improve the timeliness of progression of complaints.

Accreditation Panel findings

5.2 BACP's Professional Conduct Procedure (PCP) is published on their website alongside the protocols which support it. The website provides additional information to the public on how to obtain advice concerning issues with counselling and outlining the mechanisms for making complaints in relation to therapy.

5.3 BACP has also published its 12.6 Procedure, which is a separate, discretionary procedure for serious complaints which cannot be dealt with under the PCP. The Professional Conduct Procedure is published together with the BACP's Publication Policy, which provide advice on the timescales, durations, and information to be published via Professional Conduct Notices.

5.4 As part of our requirements for this assessment, we conducted a complaints audit. We identified a potential area for improvement in relation to the BACP's threshold procedure for managing complaints, as outlined further below. Section 2.4 of the PCP relates to their 'Case Manager's Threshold Test' and is as follows:

- *"b. A complaint meets the threshold test where it is a complaint which the Case Manager reasonably considers:
 - i. the facts alleged and evidenced by the Complainant could, if proved, amount to a failure by the Member to meet professional standards; and*

ii. is not vexatious and/or frivolous in accordance with protocol PR2.”

We identified that cases that had progressed beyond the threshold test that could have been resolved at this stage of the BACP’s complaints process. As such, the Accreditation Panel issued the below recommendation

Recommendation One: The BACP should ensure they are consistently and effectively utilising section 2.4 of their Professional Conduct Procedure (the Case Manager’s Test) to resolve cases that do not meet the threshold for progression.

- 5.5 Our complaints audit and feedback from Share Your Experience submissions suggest that the time taken to consider and resolve complaints is longer than ideal. As such, the Accreditation Panel issued the below recommendation to keep track of the BACP’s progress resolving complaints in a timely way:

Recommendation Two: The BACP should provide the PSA with an update on their work to improve the timeliness of progression of complaints about practitioners.

- 5.6 The PCP sets out the process for requesting a review of a decision, or for the appeal of a decision at relevant stages in the procedure. Section 2.6 of the PCP outlines the process for a Complainant to appeal against a Case Manager, should a decision be made that the threshold test has not been met. Section 3.7 of the PCP outlines the process for a complainant to appeal, should a complaint be rejected by the Investigation and Assessment Committee having decided that a complaint should not proceed to a hearing. This is supported by Protocol 8, which outlines the role of an Independent Reviewer. Section 6 of the PCP sets out the appeal process for either a member or complainant to submit a request for an appeal following a hearing. This is supported by Protocol 8 which outlines the role of an Independent Reviewer. The 12.6 Process also offers a route for members to request an appeal. We are satisfied that the BACP offers multiple routes for appeals at any point in the complaints process.
- 5.7 In review of the BACP’s procedures, we are satisfied they are accessible and clear to all parties, and that the BACP offers appropriate support. The BACP have developed a number of plain English guides, protocols and videos to ensure that information is easily accessible and understandable for all parties. Each complaint will be allocated a Complaints Assistant and Assessor (CAA) who is responsible for providing support to the complainant to help them formulate their complaint and ensure any evidence is provided. The CAA will have several communications with a Complainant by both telephone and email to ensure any reasonable adjustment requests are captured, to provide information on processes in a suitable for the needs of that individual and to signpost to other forms of support where needed. Once a complaint has passed the initial stages and the Member has been informed of the complaint, the case is allocated to a Case Processor (CP). The Case Processor acts in a similar way as the CAA in terms of continuing to provide information on processes in an individual’s preferred way, assess for any reasonable adjustments that may be needed and to signpost to other forms of support where needed.
- 5.8 There are a number of additional support services set up for complainants and members to access. These include BACP’s ‘Get Help Service’ which provides a confidential telephone and email guidance for members of the public on what to do if they have concerns about their therapist. BACP’s Member Support Service

is for member's who have an ongoing case being consider under the Professional Conduct Procedure to access confidential independent telephone support. The support is for up to six sessions in any twelve-month period.

- 5.9 The BACP has an overarching reasonable adjustments policy which supports the activity already being taken by the Professional Conduct team to ensure all parties can access the service. This is currently going through BACP's internal processes, and we look forward to the BACP providing us with an update in due course.
- 5.10 Section 5.12(c) of the PCP notes that the Panel must have regard to the Guidance on Sanctions Protocol (PR14), when making the decision to impose a sanction. The BACP also publishes a number of their professional conduct procedures on their, 'how we deal with complaints' webpage, which includes PR 9 – Interim Suspension, and PR15 – Previous Adverse Findings. Included on this same webpage, is the BACP's Indicative Sanctions Guidance.
- 5.11 The BACP advised us that an external firm of solicitors has been appointed to undertake an audit of substantive professional conduct hearing outcomes. The audit will effectively review and analyse a sample of the professional conduct decisions made by final hearing panels that support the BACP's Professional Conduct Procedure. The audit will focus on the following themes: proportionality of sanction set where allegations were upheld, evidence of bias in decisions and clarity of the written decision.
- 5.12 The solicitor's firm will provide a twice-yearly report summarising key findings, trends, validation of decision making and/or identification of any emerging issues relating to the decisions made and sanctions set. It will identify potential implications of the observed trends on the BACP as an organisation and recommend proactive measures to address these. As part of the audit, the firm will work in collaboration with BACP Register staff at regular intervals to ensure the audit is on track and themes emerging can be captured in a timely way. The reports will be submitted to BACP's Public Protection Committee.
- 5.13 The adjudication of complaints is separate from governance Boards, Committees and the Chief Executive. This is evident in that independent panels are convened by the Professional Conduct Scheduling team. In all cases, panellists are selected at random, to include one Chair and at least one lay panel member and at least one professional panel member. The panel are checked for any previous involvement in cases concerning the parties and are required to confirm that they have no conflicts of interest with the case/participants. Panel members who have previously heard the complaint cannot sit on another type of panel for the same case. A completely different panel will be used for each stage – IAC, hearing, sanction and any appeals. No member of BACP staff or BACP Board or committee member has any role at any stage of the complaint adjudication process.
- 5.14 The PCP also clearly sets out the constitution of all panel members. For example, an IAC and PCP Panel will consist of not less than three persons from the Association's pool of IAC and PCP Panel members, including at least one lay person and at least one Member of the Association. The Appeal Panel is independently constituted and is normally made up of three people: usually two members of the Association and an independent lay person

- 5.15 We are satisfied that the BACP assumes responsibility for investigation and prosecuting complaints, with the complainant as a witness rather than prosecutor. This is supported by the BACP's PCP, namely section 5.3 which states "*where a case is being presented on the Disciplinary Proceedings Track, the burden is on the Association to prove the allegations.*" Furthermore, "*where an independent Investigation and Assessment Committee (IAC), convened under Section 3 of the Professional Conduct Procedure, identifies allegations that could amount to professional misconduct, the case will be referred to the Disciplinary Proceedings Track (DPT) (paragraph 3.5). At that point, the Association will assume the role of complainant/prosecutor, and the original complainant may become a witness for the Association in the subsequent hearing.*"
- 5.16 The Professional Conduct Serious Case/ Safeguarding Procedure outlines the actions undertaken within the Professional Conduct Procedure where information is received via a complaint and allegations of serious misconduct (such as sexual boundary issues/assault) and/or safeguarding issues are raised. This ensures that they are dealt with expeditiously in a manner that upholds the Association's public protection responsibilities.
- 5.17 The BACP ensure that other Accredited Registers are notified of disciplinary outcomes. They do this by ensuring that relevant conduct notices are uploaded onto the BACP's website, in line with their publications policy. A link to these notices is emailed to other Accredited Registers, where relevant. The BACP are signatories of the AR Information Sharing Protocol which allows for sharing of disciplinary outcomes.
- 5.18 The BACP publishes any complaints with upheld allegations on their website in line with the PCP. When members of the public are using the directory to search for a BACP member, if there are any upheld complaints against them, there will be a link to the published notice for them to read to be able to make an informed decision about who they may engage in services with. The BACP publishes all outcomes/ notices on their Professional Conduct Notices webpage.

Standard 6: Governance

Summary

6.1 The Accreditation Panel found that Standard Six was met.

Accreditation Panel findings

- 6.2 The BACP's Public Protection Strategy sets out their strategic goals pertaining to public protection. Their first strategic goal is: '*effective regulation – enhance BACP's public protection function through commitment to continuous quality assurance and to increase confidence in regulatory functions.*'
- 6.3 The BACP provided us with their Conflict of Interest Policy, of which all Trustees, committee members and members of the BACP Senior Leadership Team are required to declare any conflicts annually. The Conflicts of Interest register is maintained by the Governance Team.
- 6.4 The Board of the BACP has delegated authority for the governance of the Register to the Public Protection Committee (PPC). The role of the PPC is to provide strategic direction and oversight to ensure that the BACP effectively safeguards the public by upholding professional standards, ethics and accountability within the counselling and psychotherapy professions.

- 6.5 The Chair of the PPC is required to be a lay member and therefore independent from the organisation. At each Board meeting, the PPC Chair is required to provide a written report on the Committee's progress and propose any recommendations made by the Committee, for the Board's approval. The Accreditation Panel is satisfied there is appropriate separation between management of the register functions, education and training provisions and professional body.
- 6.6 The BACP publishes information on their website and provides information as to how to raise a complaint about the BACP.
- 6.7 We reviewed the processes the BACP has in place regarding setting their annual budgets, and reserves level based on forecasting information. This is overseen by the Finance, Risk, Audit Policy and Procedures Committee (FRAPP).
- 6.8 The BACP provided us with documentation to evidence their business continuity arrangements.
- 6.9 We were issued with a copy of the BACP's operational risk register. The risks identified are reviewed and updated frequently. Risk is a standard agenda item for the FRAPP Committee, whereby they provide feedback on areas for improvement. The FRAPP Committee reports to the Board on the oversight of risk. The CEO reports on risk at each Board meeting (at least bi-annually).
- 6.10 We note that in late 2023, there were a number of anonymous claims made on social media regarding the management of BACP, its governance and financial controls. On 8 August 2024, the BACP published a statement regarding their management of this matter, which included an independent investigation and lists steps forward to ensure sufficient governance of the BACP. This matter was considered by the Accreditation Panel, who were satisfied with the actions taken by the BACP to address the concerns raised.
- 6.11 The BACP Articles of Association and Standing Orders set out the roles, responsibilities and powers of the Trustees. Both governing documents are available on the BACP website. The BACP provided us with their Terms of Reference for the Board and delegated committees; these were reviewed by the Accreditation Panel who were satisfied with the arrangements.
- 6.12 The BACP told us that when seeking to recruit into vacancies on the Board or its Committees, consideration is given to the skills gaps identified through a skills audit as well as reviewing the current diversity metrics. When advertising vacancies, appropriate language is used to attract under-represented communities to apply. The BACP reported this has enabled them to achieve diverse representation not only on the Board, but also its committees.

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

Summary

- 7.1 The Accreditation Panel found that Standard Seven was met. It issued the following Condition.

Condition One

- The BACP must provide clear information about the limitations of treatment offered by their registrants.

Accreditation Panel findings

7.2 The BACP provided us with their Risk Register. They advised us that this is reviewed quarterly by an internal steering group. The risk matrix is then reviewed by the Registrar and Assistant Registrar and then shared with the Public Protection Committee on a periodic basis. The BACP provided us with minutes of their PPC Meeting, where we reviewed evidence of this being discussed.

7.3 The BACP provides information to the public about the services they provide, via a dedicated section of their website titled 'About Therapy.' This section of the website covers a range of topics which include, what counselling is, what a member of the public can expect of a counselling session, an a-z of therapeutic approaches, and information about our public facing support service, for those who have general enquiries about therapy or concerns about their therapeutic relationship. While the Accreditation Panel acknowledged there is a large range of modalities and types of treatment/ therapies offered by registrants, they felt it should be abundantly clear what areas registrants cannot assist with (for example, that therapy is not a crisis service). The Accreditation Panel considered that this tied in with ongoing work the BACP is completing in relation to safeguarding and the risk of suicide and self-harm, and the ongoing updates to their Good Practice in Action Guidelines pertaining to NG225: Self-harm: assessment, management and preventing recurrence. As such, the Accreditation Panel issued the below condition:

Condition One: The BACP must provide clear information about the limitations of treatment offered by their registrants.

Standard 8: Communications and engagement

Summary

8.1 The Accreditation Panel found that Standard Eight was met.

Accreditation Panel findings

8.2 The BACP told us that their current website was launched in 2018, and they are currently undertaking a significant 'web relaunch' project with a view to launch a newly designed website and functionality in 2025/2026. Ongoing improvements are made to BACP's website and database on a monthly basis as part of their Continual Improvement Model.

8.3 The BACP also told us that their website was designed with accessibility in mind, and they have used fonts and colours which are designed for easy screen readability and helps users with visual impairments.

8.4 The BACP provides clear information regarding registration requirements from their website. Registered members can download personalised BACP membership logos and certifications from the member dashboard areas of their website, and are sent a membership card on an annual basis. This includes information about appropriate use of the PSA Quality Mark, as referenced above in this report.

- 8.5 Information published on the BACP's website is clear. Key processes and policies are published on the BACP's website, and are easy to find, given the drop-down banner and search bar at the top of the BACP's website.
- 8.6 Grades of membership and registration are clearly displayed on the BACP's website. The 'memberships' webpage sets out the different levels of membership available through the BACP. From this main page, it is possible to click through to each category of membership to find out further information including full details of the category, including benefits, entry requirements, commitments (where relevant, being bound by the Ethical Framework and Professional Conduct Procedure), costs and how to apply.

Share your experience

We received a large number of responses to our invitation to share experiences of the BACP, in conjunction with a number of submissions received since the BACP's last assessment. The most common concerns were in relation to the SCoPED Project, and Standard Five – Complaints and Concerns about Registrants. We have not considered any concerns relating to SCoPED as part of this full renewal assessment, given these issues are being dealt with separately (via SCoPED Notification of Change). The other concerns received relation to Standard Three – Standards for Registrants, Standard Six – Governance, Standard Four – Education and Training, and Standard Eight – Communications and Engagement.

These responses were considered by the Accreditation Panel. The Accreditation Panel gave particular consideration to submissions in relation to Standard Five, given this appeared to be the area of most concern. The Accreditation Panel noted that most submissions appeared to be either in relation to timeliness and management of complaints and registrants and/or complainants being dissatisfied with the outcome of their complaint. The Accreditation Panel considered the concerns regarding timeliness would be address through implementation of the recommendations under Standard Five. In relation to dissatisfaction with complaint outcomes, the Accreditation Panel noted this falls outside of the scope of the Accredited Registers programme given we do not have jurisdiction to overturn complaint decisions.

The Accreditation Panel also discussed other areas of concern, including Standard Six, and were satisfied that the BACP had taken, or were taking adequate measures to rectify concerns which were raised.

The Accreditation Panel were satisfied that the BACP had addressed issues of public safety and public protection, and did not identify any areas requiring further oversight.

Impact assessment (including Equalities impact)

We carried out an impact assessment as part of our decision to accredit the BACP. This impact assessment included an equalities impact assessment as part of the consideration of our duty under the Equality Act 2010.

We have reconsidered our impact assessment in line with our processes for re-accreditation. We identified positive impacts in relation to some groups with protected characteristics and have identified overall positive impacts in relation to equalities, cost and market and social and environmental impacts. While we have identified some areas of risk in the above report, we are satisfied these can be mitigated with the implementation of the above recommendations and condition.

Furthermore, the BACP hold the largest register, and are the largest oversight body for counsellors and psychotherapists in the UK; maintaining high standards for accreditation therefore has a positive impact on the public and public protection. As such, it is therefore considered that it is in the public interest to re-accredit the BACP.