

ASSOCIATION OF CHRISTIAN COUNSELLORS (ACC)

ANNUAL REPORT BY CHAIR OF REGISTER ADVISORY PANEL (RAP) OF ACC TO THE PROFESSIONAL STANDARDS AUTHORITY (PSA) FOR ACCREDITATION YEAR 2019-2020

- 1) I joined the RAP on 1 June 2017, taking on the role of its Chair.
- 2) The current members of the RAP with voting rights are Doreen Rowland (DR), Heather Churchill (HC), Richard Needle (RN) and myself (Catherine Clarke).
- 3) DR and HC became members of the RAP at approximately the same time as I did; RN became a member in 2018.
- 4) During the accreditation year 2019-2020, the RAP has held meetings on 3rd May 2019, 30th August 2019, and 13th December 2019, which accords with the requirements of the RAP's Terms of Reference in relation to the minimum number of meetings required to be held each year. Each meeting lasted approximately 3 hours.
- 5) With the exception of HC, who was unable to attend the meeting on 3rd May 2019 for personal reasons, all voting members attended all meetings during the 2019-2020 accreditation year. HC attended the meeting on 13th December 2019 via video link (as permitted under the RAP's Terms of Reference, once the Chair has given permission). Therefore, each of the above meetings was quorate (under the terms of the RAP's Terms of Reference).
- 6) The above meetings were also attended by Sue Monckton-Rickett (ACC Chair), Kathy Spooner (ACC Director of Counselling) and (other than the

meeting on 30th August 2020) Dawn Sherry (ACC Registrar), each of whom is a non-voting member of the RAP.

- 7) The next RAP meeting is scheduled to take place, via video link on account of the current Coronavirus pandemic, on 24th April 2020.
- 8) The main work undertaken by the RAP during the 2019-2020 accreditation year is described in the published minutes of the above RAP meetings, which are available on the ACC website: <https://www.acc-uk.org/the-acc-register/register-advisory-panel.html>. The minutes, however, do not disclose confidential matters which were discussed at these meetings.
- 9) In my last annual report to the SRA, dated 19th March 2019, I stated that the focus for the RAP for the Accreditation Year 2019-2020 was to:
 - undertake its responsibilities as set out in its Terms of Reference;
 - monitor ACC's implementation of matters agreed by the RAP; and
 - be responsive to issues raised by ACC's Chair, Director of Counselling and/or Registrar in relation to the ACC's register, risk management and the protection of the public.
- 10) I confirm that the RAP has undertaken its responsibilities during the past year in accordance with its Terms of Reference (TOR). One of the requirements in the TOR is for the terms themselves to be reviewed by the RAP on an annual basis. The TOR were discussed at the RAP meeting held on 3rd May 2019, after which an updated version of the TOR was issued.
- 11) The matters agreed by the RAP during the 2018-2019 Accreditation Year requiring implementation by the ACC during the 2019-2020 Accreditation Year are set out below. Part of the RAP's role (see (9) above) is to monitor the implementation of these matters, and details of their implementation are summarised below:
 - a) Selection criteria for membership of the RAP to be reviewed on an annual basis – *scheduled for April 2020 Meeting*

- b) The RAP recommended that software be developed to allow the audit selection process to be undertaken by randomised computer generation rather than by a member of ACC's Registrar team. *[No progress from last year. The software development has been specified and costed by ACC's application system software suppliers. An in-house means of developing this is being considered as a more cost-effective way of achieving the functionality. Current position is that the in-house development remains on ACCs' internal system development to-do list]*
- c) The RAP recommended that the Accreditation Committee amend the wording in sections 2a and 2b of the Counsellor audit form to allow the "confirmation" to come from a Christian character witness rather than a Church fellowship leader. **[Completed]**
- d) The RAP recommended that ACC establish an internal panel to assess the risk relating to the registration of applicants with unspent convictions, and that the ACC Risk Register be reviewed to ensure that it covered this risk (*i.e. to include a field whereby registrants with unspent convictions are assessed as to their suitability to work with vulnerable adults and children*). **[Completed]**
- e) The RAP recommended that a policy document be produced for managing the situation where an ACC-registered counsellor has a complaint made against him/her via a different professional/registered membership **[Completed, incorporated within the new complaints policy]**
- f) The RAP recommended that guidance be prepared for counsellors on what can and cannot be said on their individual "Find a Counsellor" page; *[actioned on an individual basis and will be part of planned production of a terms and conditions of membership]*, and
- g) The RAP recommended that criteria be formulated relating to the selection of appropriate sponsors on the New Registrant Application Form. **[Completed]**
- 12) The recommendations listed in 13) below are examples of where the RAP was responsive to issues raised by ACC's Chair, Director of Counselling and/or Registrar in relation to the ACC's register, risk management and the protection of the public. The main issues brought to the RAP include:
- Re-structure of ACC

- Design of an audit for supervision practice
- Re-design of complaints procedures and processes
- Discussion of practice risks uncovered by the audit and complaint processes

13) In addition, during the 2020-2021 Accreditation Year, the main recommendations made by the RAP in relation to the ACC's Register of Members were as follows:

- **Complaints Procedure** (*including role of RAP*): a significant amount of time, at both the May 2019 and August 2019 RAP meetings, was given over to a review of the proposed updated Complaints Procedure produced by KS, ACC's Director of Counselling. One particular aspect discussed was the extent to which the RAP should or should not become involved in the management of complaints relating to ACC members. The RAP concluded that it should only be provided with information relating to the general nature of individual complaints, rather than the specifics in terms of the identity of the individual involved. It was agreed that the RAP should be provided with a summary report at each RAP meeting setting out sufficient information to enable the RAP members to see that complaints were being progressed in line with the agreed processes and timelines. Once a complaint has been concluded, the report would include a summary headline of the nature of the complaint in order to inform the panel about potential risk areas relating to registrant's practice. In addition, it was agreed that, in the case of an appeal against a decision, the Chair of the RAP could be called on to determine an appeal relating to whether the correct **process** had been followed by the ACC in managing a complaint – but not in relation to the outcome of a complaint, or the sanction imposed. The RAP also recommended that the updated complaints procedure be reviewed by ACC after its first year, and every two years thereafter. In addition, the RAP recommended that potential complaints which were resolved at an early stage should be categorised as "near misses" and records kept of these in order to inform future training/development.
- **ACC restructuring**: the RAP was kept apprised of the ACC Board's restructuring proposals for the ACC in terms of the redundancy,

reallocation, etc. of various posts and roles within the organisation and was satisfied that there was no significant risks to the ACC's satisfactory maintenance of the Register of Members while these changes were taking place, given the highly experienced members of staff who were managing the "business as usual" tasks – although it was accepted that projects relating to more strategic aims would have to be put on hold until the new CEO and Director of Pastoral Care, Coaching and Mentoring were in post;

- **Accreditation Transfer Route:** the RAP recommended that the accreditation transfer route (e.g. from BACP or UKCP) should be extended to include BACP senior accredited supervisors, as well as accredited counsellors, and that the same requirement as is currently imposed on accredited counsellors (i.e. to write a 2,000 word reflective essay on how faith informs their practice) should also be required for senior accredited supervisors wishing to become accredited ACC supervisors via the accreditation transfer route;
- **Practice Break Guidelines:** the RAP reviewed the updated Practice Break Guidelines, and proposed a number of amendments, such as including a requirement for the registrant to have discussed taking a practice break with their supervisor, and to advise both their supervisor and their insurer when proposing to return to practice;
- **Role of Supervisors:** the RAP recommended that guidelines/standards be produced for individuals who **supervise** ACC members, to include a particular emphasis on the desirability of avoiding "dual roles", and to set out in the guidelines the need for a clear rationale and the need for risk mitigation measure to be put in place, in the event that a dual role is being undertaken (*e.g. in the case of a supervisor who is also a manager*);
- **Supervisor Audit Form:** the RAP reviewed the draft Supervisor Audit Form produced by the ACC's Accreditation Team and recommended that the consequences of non-compliance with audit requirements within the required timeframe (particularly in relation to non-compliance with CPD requirements) be spelt out:
- **Audits – consequences of non-compliance:** when audits are undertaken (for both members and supervisors) the RAP proposed that a formal letter be sent by post to members/supervisors clearly stating that the individual must comply with the audit requirement

within the stated deadline or that their membership will be terminated – and that appropriate evidence will be required if individuals seek to postpone the audit on account of ill health or a significant life event;

- **Personal counselling and CPD requirement:** the RAP suggested that the ACC revisit its position on CPD whereby personal counselling does not currently count towards a member's annual CPD requirement;
- **Ethics and Practice Guidelines:** The RAP discussed the proposed changes being made by the ACC's Training, Development and Accreditation Committee to the current Ethics and Practice Guidelines, and raised a number of issues such as whether ACC could continue to restrict membership to Christians capable of signing the Statement of Faith. The RAP concluded that it was appropriate to do so. (*Note: Updating the Ethics and Practice Guidelines is a large piece of work and the RAP will be further involved in reviewing the updated version during the forthcoming Accreditation Year.*)
- **PSA Standard 3 relating to risk management:** the RAP discussed the potential risk of "disrespect for client autonomy" specifically in the context of counsellors who are Christian, and identified the need to develop competencies in relation to spiritual and religious interventions in professional counselling, and to define the scope of practice.

14) Looking forward to Accreditation Year 2020-2021, the RAP will continue to carry out the following roles:

- undertake its responsibilities as set out in its Terms of Reference;
- monitor ACC's implementation of matters agreed by the RAP; and
- be responsive to issues raised by ACC's Chair, Director of Counselling and/or Registrar in relation to the ACC's register, risk management and the protection of the public.

In addition, the ACC is proposing to review its accreditation process during the course of 2020-2021, and the RAP will be undertaking a similar exercise, with a view to feeding in to the final position reached by the ACC on this extremely important issue. Also, as referred to at (13) above, the RAP will also be reviewing the ACC's updated Ethics and Practice Guidelines, once these become available.

- 15) It should be noted that two members of the RAP (CC and DR) attended, along with KS and Chris Williams [*a Board member of ACC*] a day-long risk seminar specifically for accredited registers run by the Professional Standards Authority on 2nd April 2019, and found all the sessions (and particularly those on safeguarding and on complaints) extremely valuable. As a result, at the following RAP meeting (held on 3rd May 2019) the members of the RAP were able to have an informed discussion on these and other risk issues, in the particular context of the ACC's Register.
- 16) The TOR states that voting members' appointments to the RAP are for a period of three years, after which time voting members may be re-appointed for a further three-year period (at which point they stand down). Given that CC, DR and HC joined the RAP in mid-2017, KS asked at the December 2019 meeting whether they would consider being re-appointed to the RAP from mid-2020 for a further period of three years. All three individuals confirmed that they would be happy to do so. This, therefore, maintains the stability of the RAP membership for the foreseeable future.

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**I confirm that I am satisfied with the arrangements which have been put in place for the management of ACC's Register of Members for the Accreditation Year March 2019 to March 2020.**



**Catherine Clarke**  
**Chair of the ACC's Register Advisory Panel**  
**28 March 2020**