

ASSOCIATION OF CHRISTIAN COUNSELLORS (ACC)

ANNUAL REPORT BY CHAIR OF REGISTER ADVISORY PANEL (RAP) OF ACC TO THE PROFESSIONAL STANDARDS AUTHORITY (PSA) FOR ACCREDITATION PERIOD MARCH 2020 – APRIL 2021

- 1) I have been a member of the RAP since 1 June 2017, when I was appointed to the role of Chair. The appointment was initially for a three-year term. In December 2019 I was invited by the ACC to continue in this role for a further three-year term, an invitation which I was pleased to accept.¹
- 2) At the beginning of the 2020-2021 accreditation period the members of the RAP with voting rights were: Doreen Rowland (DR), Heather Churchill (HC), Richard Needle (RN) and myself (Catherine Clarke). As DR and HC had been appointed to the RAP at approximately the same time as I had been,² they were also invited in December 2019 to continue as members of the RAP from mid-2020, for a further period of three years. They both confirmed that they would be happy to do so.

The reappointment of these members, and the recruitment of a new member, Fiona Stephenson, to the RAP in September 2020 (*see further below*) maintains the stability of the RAP membership for the foreseeable future, and also introduces an element of succession planning. This latter point was one of the suggestions made by the PSA's accreditation team in its feedback on the ACC's Accredited Register renewal process for the 2019-2020 accreditation year ("*consider succession planning for RAP*"). In terms of further succession planning, I have specifically requested that particular efforts be made to recruit future RAP members from a diversity of ethnic backgrounds – for example, members of the recently-formed ACCENT group ("*ACC Ethnic Tapestry*") of ACC members from the BAME community. In addition, we have identified that the current composition of the RAP

¹ Note that the Terms of Reference (TOR) of the RAP state that the appointment of voting members to the RAP is 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.

² RN became a member in 2018.

does not include any experts in the field of patient or consumer advocacy, so I have requested that any applicants identified in the near future should preferably have experience in this area.

3) Fiona Stevenson MSc CMgr FCMI brings her skills as a consultant, coach, mentor and facilitator to her new role as a RAP member. Fiona is a Chartered Manager, with a masters degree in charity management, as well as being an International Coach Federation (ICF) certified coach and a European Mentoring and Coaching Council (EMCC) accredited coach/mentor at Senior Practitioner level.³

4) It has also been agreed that a protocol for the recruitment of future members to the RAP will be put in place, to include the following:

- Any candidates not already known to the RAP will be asked to write a brief statement setting out why they wish to join the RAP and what relevant expertise and experience that can contribute
- A reference will need to be provided
- In terms of risk/reputation management, a check will be carried out on the candidate's social media presence/website
- Candidates will be invited to a meeting with the chair of the RAP, one RAP panel member and one "expert" in the counselling field and/or to the next scheduled RAP meeting before being invited to join

This policy document has now been drafted and approved: see further details at para (10) below.

5) During the accreditation period March 2020 – April 2021, the RAP held meetings on 24th April 2020, 10th July 2020, 25th September 2020, 11th December 2020 and 19th March 2020. ⁴ Each meeting lasted approximately 3 hours. On account of the legal restrictions on in-person gatherings as a result of the Covid pandemic, each of these meetings took place remotely

³ For details of the skill profile of the other members of the RAP, refer to the biographical entries on the dedicated RAP page of the ACC's website: <https://www.acc-uk.org/the-acc-register/register-advisory-panel.html>.

⁴ This accords with the requirements of the RAP's TOR in relation to the minimum number of meetings required to be held each year.

via video conference.⁵ All voting members attended each of these meetings. Therefore, each of the above meetings was quorate.

- 6) The above meetings were also attended by Sue Monckton-Rickett (ACC Chair), Kathy Spooner (KS) (ACC Director of Counselling and, latterly, ACC CEO) and 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 on 18th June 2021.
- 8) The main work undertaken by the RAP during the above period is described in the published minutes of the above meetings, which are available on the ACC website at <https://www.acc-uk.org/the-acc-register/register-advisory-panel.html>. Note, however, that the published minutes do not disclose confidential matters which were discussed at these meetings.
- 9) In my last annual report to the SRA, dated 23rd March 2020, I stated that the focus for the RAP for the accreditation period 2020-2021 was as follows:
 - 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. CC and KS met (online) in May/June 2020 to review and redraft the TOR (and also the RAP membership selection criteria), both of which were circulated to the members of the RAP in advance of the RAP meeting held on 10th July 2020.

⁵ Note that this method of convening meetings is permitted under the RAP's Terms of Reference, once the Chair has given their permission.

The documents were discussed at this meeting and further amendments made. In relation to the RAP selection criteria document, it was agreed that it should also include a requirement to disclose any potential conflicts of interest.⁶

On this point, it was also noted that the PSA’s accreditation team had recommended (*in its feedback on the ACC’s Accredited Register renewal process for the 2019-2020 accreditation year*) that the ACC’s conflicts of interest policy should be extended to the RAP. It was therefore agreed that the RAP should have a separate “Conflict of interest” policy (similar to that drafted for the ACC Board). In addition, a requirement for attendees to declare any potential conflicts of interest at the beginning of each RAP meeting has now been incorporated into the template agenda for RAP meetings (*see para (10) below*) and adopted for all RAP meetings starting from the meeting held on 10th July 2020.

It was also agreed that an additional policy document was required, to set down the process for the recruitment of new members to the RAP (*see para (4) above*), and the rules which member of the RAP need to follow (in terms of their ongoing responsibility to attend meetings, etc.) and also specifying the process to be followed if an individual needed to be removed as a member of the RAP before the end of their term (i.e. setting out the grounds for termination; who would be responsible for the removal of the member, etc). This policy document was approved by the members of the RAP at their meeting on 25th September 2020.

- 11) During the March 2020 - April 2021 Accreditation Period, the main recommendations made by the RAP to the ACC in relation to the ACC’s Register of Members were as follows:

- 1.

Clearer role for RAP in creation and review of ACC policy documents:

Clearer guidance for the RAP as to: (1) which ACC policies should come within the remit of RAP, (2) the process to apply to the review and sign-off of

⁶ The final versions of both these documents were approved at the RAP meeting held on 25th September 2021.

new draft policies and of policies which need to be reviewed; and (3) how to track where policies are in their revision/update and review cycles.

It was agreed that:

- Policies relating to the governance of ACC should be notified to RAP for comment/review
- Policies relating to standards of practice by ACC registrants should first be presented to ACC's Board, then presented to the RAP for suggested amendments/comment, with the final version being ratified in a subsequent ACC Board meeting
- Updates to policies which need to be actioned between RAP meetings may, by exception, be reviewed by way of email to the RAP members
- A catalogue of all relevant policies would be created and maintained, including details of review timescales and progress tracking for draft revised policies, and circulated to RAP members ("tracking catalogue")
- A proforma agenda template would be created for RAP meetings, setting out which category any supporting materials provided with the agenda came within, in accordance with the following headings: for information, for approval, for attention.

Outcome: These new arrangements in relation to the RAP's input into ACC policy documents are now in place.

2.

Complaints procedure: introduction of new reporting requirement to assist in assessment of longer term trends in the number and nature of complaints.

Background: Complaints are the most tangible information available in relation to practice issues, and it is therefore essential that the ACC's complaints procedure is robust, fit-for-purpose, and regularly reviewed and updated to take on board any learning points which may emerge.

During the course of 2019, when the ACC's Complaints Procedure was being updated, the RAP had concluded that it should not become involved in the management of complaints relating to ACC members. Instead it should only be provided with information relating to the general nature of individual complaints by way of a summary report at each RAP meeting. This summary report needed to set out sufficient information to enable the RAP members to see that complaints were being progressed in line with the agreed processes and timelines. 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.

During the course of the 2020-2021 Accreditation Period the RAP proposed an additional requirement in relation to the reporting of complaints (including "near misses") to the RAP, viz. the production of an annual "year to year" report on complaints, in addition to the quarterly report provided in advance of each RAP meeting. The purpose of this additional report would be to give a longer-term view of complaints, to assist in spotting trends and patterns and also to identify whether the number of complaints was decreasing/increasing over time. In relation to trends and patterns, this information would be key to identifying mitigating action which the ACC should put in place (e.g. in relation to dual relationships).

In addition, one of the suggestions made by the PSA's accreditation team (as part of the feedback on the ACC's Accredited Register renewal process for the 2019-2020 accreditation year) was that the ACC needed to design and document an appeals hearing process as part of its complaints procedure. At the RAP meeting held on 19th March 2021 when the proposed appeals protocol was being reviewed, the RAP suggested that the appeal process should set out more clearly the criteria which needed to be satisfied in order for an appeal to be allowed, and the fact that a separate investigating panel to that which had initially heard the complaint would be established.

Outcome: The new arrangement in relation to the reporting of complaints is now in place. The proposed new section of the complaints procedure in relation to appeals is due to be issued to the RAP in advance of its next meeting in June 2021.

3.

Membership audit: Stricter rules surrounding audit compliance, and consequences of non-compliance

Whenever 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, and setting out the consequences of non-compliance or unsatisfactory submissions, and also highlighting that appropriate evidence would be required if individuals sought to postpone an audit on account of ill health or a significant life event. The RAP also advised that in some professions (e.g. within the NHS) an audit is sometimes called a “*revalidation process*” and this may be a helpful frame within which registrants could view the audit process.

In relation to auditing more generally, a “standing item” has now been added to the pro-forma agenda for all RAP meetings to ensure that the RAP is advised on a regular basis of the number of audits in progress at any one time, and the status of each.

Outcome: RAP proposals re covering letter incorporated within audit protocol, and update on status of audits added as a standing item to all RAP meetings.

4.

Counselling competency common framework (membership of SCoPEd project group) and creation of bespoke ACC Core Competencies Framework

Background

In approximately 2017, the British Association of Counselling and Psychotherapy, the UK Council for Psychotherapy and the British Psychoanalytic Council made a decision to work collaboratively to further the counselling profession in the U.K. One of the projects from the collaboration is the creation of a framework/set of common standards of competency and training within counselling (the project is called SCoPEd, which is an abbreviation of Scope of Practice and Education). In 2020 ACC, alongside three other Accredited Registers in the counselling field, were invited to join the SCoPEd project group on the basis of full participation and common ownership.

ACC proposed that Heather Churchill - who is a member of the RAP – should be the ACC's representation on SCoPEd, on the basis of her professional experience.⁷ Before HC's appointment to the SCoPEd project was confirmed, the RAP discussed whether this might present any conflict of interest with her role as a member of the RAP, and concluded that it did not.

It was noted by the RAP that the PSA's accreditation team had suggested (as part of the feedback on the ACC's Accredited Register renewal process for the 2019-2020 accreditation year) that the creation of a competency framework should be progressed. In addition to her work on setting common competency standards for all counsellors as part of the SCoPEd project, during the course of the current accreditation period HC has also drafted a bespoke Core Competencies Framework for ACC members. Following review by a panel of experts this was [launched](#) in March 2021 as the [Churchill Framework](#).

⁷ HC has set up the only single honours BA degree in counselling taught from a Christian worldview, in addition to two MA degrees in counselling taught from a Christian worldview.

Outcome: ACC have become active members of SCoPEd, and the Churchill Framework of core competencies for ACC-registered counsellors has been published.

5.

Review of ACC Risk Register

The RAP noted that the PSA's accreditation team had recommended (in its feedback on the ACC's Accredited Register renewal process for the 2019-2020 accreditation year) that the ACC's Risk Register should be reviewed and revised. The ACC's Risk Register sets out the potential risks to the public resulting from the ACC's holding of an accredited register of counsellors, and how these risks may be mitigated. As part of this review process, the RAP undertook a thorough review of the Risk Register at its meeting on 11th December 2020 and proposed a number of amendments all of which have been taken on board by the ACC.

Outcome: Risk Register reviewed by RAP as part of overall review process, and Risk Register amended accordingly.

6.

ACC membership statistics: regular updates on joiners/leavers

In the current unprecedented times caused by the global pandemic, the RAP was keen to identify any significant movements in membership numbers. It therefore requested that a monthly summary of joiners/leavers be circulated to the members of the RAP (and also added to the RAP's private Sharepoint folder) setting out the numbers joining and leaving each month, and their

reasons for doing so. Figures provided so far indicate that membership numbers are not, in fact, decreasing, but are in fact showing a slight increase.

Outcome: Regular updates on membership joiners/leavers are being provided to the members of the RAP.

- 12) During the March 2020 - April 2021 Accreditation Period, the RAP also undertook the following:
- Raised questions regarding the detailed processes (including insurance cover and the security of client data) which were being put in place for the provision of free counselling services to NHS employees and others affected by the Covid pandemic, as part of the ACC's Covid-19 Crisis Counselling Support Services (CCSS) initiative;
 - Reviewed the guidance being provided to ACC counsellors to ensure that they were undertaking the provision of counselling services in a Covid-safe environment;
 - Checked that the ACC was continuing to provide a range of CPD opportunities for its members (via online training) during the Covid pandemic;
 - Established that arrangements had been put in place to ensure that confidential material was being properly managed while ACC staff were required to work away from the office during the Covid pandemic;
 - Reviewed and commented on draft versions of the ACC's whistleblowing policy and "duty of candour" policy document;
 - Acted as a sounding board in relation to the rules around what can (and cannot) be included in the revamped "Find a counsellor" facility on the ACC website (i.e. in order to ensure that registrants fully meet advertising guidelines; do not inflate specialist skills; separate counselling work from adjunct therapies such as coaching, mentoring, running retreats, spiritual direction, etc.).
- 13) Looking forward to the next 12 months 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.

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 period March 2020 – April 2021.

Catherine Clarke

Catherine Clarke

Chair of the ACC's Register Advisory Panel

11 May 2021
