



**ASSOCIATION OF CHRISTIANS IN COUNSELLING AND LINKED PROFESSIONS (ACC)**

**ANNUAL REPORT BY CHAIR OF REGISTER ADVISORY PANEL (RAP) OF ACC TO THE PROFESSIONAL STANDARDS AUTHORITY (PSA) FOR THE PERIOD 1 MAY 2022 – 30 APRIL 2023**

**1. BACKGROUND INFORMATION ON RAP MEMBERSHIP AND RAP TERMS OF REFERENCE (TOR)**

**1.1 Duration of RAP Appointments:** I have been a member of 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, from 1 June 2020. The RAP Terms of Reference were amended in 2022 to permit members of RAP to continue in the role for a third three-year term, if requested by the ACC Board of Trustees to do so, rather than being required to step down at the end of their second three-year term. I, and the other members of RAP who were approaching the end of their second three-year term (*see para 1.2 below*) were invited to continue in the role, which each of us agreed to do. I will therefore be standing down as Chair of RAP by no later than 30 May 2026.

**1.2 Current (and future) membership of RAP:** The current membership of RAP with voting rights are: Dr. Heather Churchill (HC), Doreen Rowland OBE (DR); Richard Needle (RN), Fiona Stevenson (FS), Tim Warren (*who is a retired solicitor, and who joined RAP in late 2022*) and myself (Catherine Clarke). DR and HC were appointed to RAP at approximately the same time as I was and, having agreed to serve a further three-year term from mid-2023, will therefore also be required to step down from RAP by no later than mid-2026. RN became a member in mid-2018, and agreed in 2021 to serve a further three-year term, until mid-2024. FS became a member in September 2020, and has agreed to serve a second three-year term when the current term expires. Although the change to the RAP TOR, and the agreement of the existing members to remain members, means that there is no immediate issue in terms of succession planning, it is important that this issue is not overlooked and that ACC remains on the lookout for potential suitable new recruits. I am aware, for example, that the ACC leadership team have been canvassing members of ACC's ACCEnT group (*"ACC Ethnic Tapestry", which is a group within ACC for black and minority ethnic counsellors and pastoral care practitioners*) given the importance of recruiting future RAP members from a range of ethnic backgrounds, but that these efforts have so far proved unsuccessful. In addition, I understand that, despite invitations to join RAP having been advertised prominently in ACCORD, ACC's quarterly newsletter, no expressions of interest have thus far been forthcoming. I have also suggested contacting recruitment organisations specialising in non-executive directorships, as this could open up access to a pool of talent who might be looking to take on an unpaid role of this nature in exchange for gaining experience of a governance role. It was also suggested to the ACC that advertising in the charity sector, and through the National Council for Voluntary Organisations, might be a good source of recruitment.

**1.3 Frequency of RAP meetings and attendance by RAP voting and non-voting members:** During the accreditation period 1 May 2022 to 30 April 2023, RAP held meetings on 17 June 2022, 30<sup>th</sup>



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September 2022, 2<sup>nd</sup> December 2022, 10<sup>th</sup> February 2023 and 24<sup>th</sup> March 2023.<sup>1</sup> In addition, a supplementary meeting to discuss the response to Condition 2 of the PSA's Targeted Review (*see further below*) took place on 10<sup>th</sup> November 2022. Other than this supplementary meeting, which lasted approximately 2 hours, each of the above meetings lasted approximately 3 hours. All meetings, other than the meeting held on 2<sup>nd</sup> December 2022, took place remotely via video conference.<sup>2</sup> Each meeting was quorate.<sup>3</sup> As well as attendance by a quorum of voting members, the above meetings were also attended by one or more of Sue Monckton-Rickett (ACC Chair of Trustees), Kathy Spooner (ACC CEO) and Gillian Stuart (ACC Head of Membership Services), each of whom is a non-voting member of RAP. In addition, the meeting held on 10<sup>th</sup> February 2023 was also attended by ACC Board member, Wien Fung, in accordance with one of the outcomes of the PSA Targeted Review (*see further below*). The next RAP meeting is scheduled to take place on 19<sup>th</sup> May 2023.

**1.4 Minutes of RAP meetings:** The main work undertaken by 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 that the published minutes have been redacted to ensure that confidential matters which were discussed at these meetings are not disclosed.

**1.5 Updating of RAP Terms of Reference:** The Terms of Reference for RAP were updated by ACC in April 2023, to reflect the wording of the SRA's revised accredited register standards. A more in-depth review will take place at the RAP meeting scheduled for 19<sup>th</sup> May 2023.

## 2. PSA TARGETED REVIEW (CONDITION 1: COMPLAINTS PROCESS; CONDITION 2: GOVERNANCE)

### 2.1 Background

The ACC had, during the period 2019-2022, been working up an updated complaints policy, the process being refined through two main cycles of review by RAP<sup>4</sup> and the ACC's Board of Trustees. The final stage in the process involved piloting the updated policy to identify operational/procedural problems and to gain feedback from participants before finalising and publicising the updated policy. However, the plan to run the pilot was **reported** to RAP and to the ACC's Board of Trustees, rather than being **proposed** for their consideration. Therefore, the concept of running a pilot process was not properly considered by either RAP or the Board, in terms of all its potential impacts, and in relation to compliance with the PSA's Standards for Accredited Registers.<sup>5</sup>

In 2022, one of ACC's counselling registrants, who was undergoing a complaint investigation, raised a 'share your experience' (SYP) concern with the PSA. As a result of this SYP concern, the

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<sup>1</sup> This accords with the requirements of the RAP's TOR, which stipulates a minimum of three meetings to be held each year.

<sup>2</sup> This method of convening meetings is permitted under the RAP's TOR, once the Chair has given their permission.

<sup>3</sup> Under the RAP's TOR, a quorum is three voting members.

<sup>4</sup> This is referenced in my last annual report, for the 2021-2022 accreditation year.

<sup>5</sup> See [https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/standards-for-accredited-registers.pdf?sfvrsn=cc2c7f20\\_6](https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/standards-for-accredited-registers.pdf?sfvrsn=cc2c7f20_6).



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PSA's Accreditation Team undertook a targeted review of the ACC's new complaints process as part of the 2022 annual review process.<sup>6</sup>

The PSA's panel concluded, in its report on the Targeted Review which was published in October 2022, that the revised complaints process was flawed and that it did not to meet the register standard (*Standard 5: Complaints and concerns about registrants*) and also that the ACC needed to amend its governance mechanisms to ensure clear and transparent decision-making in respect of future changes to key regulatory processes, as well as ensuring compliance with the PSA's rules for Accredited Registers (*Standard 6: Governance*). In particular, concern was raised in relation to the fact that the re-design of the complaints procedure had not been subject to the PSA's "notification of change" process.

As part of the targeted review, the PSA issued the following two Conditions (*Condition One relating to Standard 5; Condition 2 in relation to Standard 6*) which the ACC was required to comply with, within a three-month period:

#### Condition One

**The ACC must address issues raised regarding a complaints process that was different to that published on its website, and to the one reviewed by the Authority in its previous assessments. This should include:**

- a) Ending immediately the new complaints process and reinstating the previous process that was approved by the Authority.**
- b) Where (a) will lead to difficulties with currently open complaints, finding a way of managing those complaints in a way which is consistent with good practice in complaints handling and with good practice for such processes and the requirements of the Human Rights Act, including the right to a fair trial.**
- c) Providing a plan for development of an updated complaints procedure. This must include appropriate independent support to assure that its process is fair, transparent, consistent, explained clearly, and legally sound. The process must include lay participation at appropriate stages and clearly set out the actions it can take to manage serious concerns against registrants.**

#### Condition Two

**The ACC must provide a report on how it will amend its governance mechanisms to ensure clear and transparent decision-making on future changes to key regulatory processes, and compliance with our rules for Accredited Registers scheme will be achieved. This must demonstrate insight of why the issues identified arose and include mechanisms to assure that the ACC's future actions are appropriately considered, recorded, and communicated.**

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<sup>6</sup> The targeted review allowed the Accreditation Team to take a 'deep dive' into the process, and the complaints being dealt with in accordance with the process, and to present any resulting concerns to a panel for their assessment in terms of compliance with the PSA's Standards for Accredited Registers.



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## 2.2 RAP's input re compliance with Condition One of Targeted Review – COMPLAINTS PROCESS

At the RAP meeting held on 30<sup>th</sup> September 2022, at which the PSA's Targeted Review was discussed, it was noted that the PSA's main concern appeared to be that a draft of the updated complaints policy had not been provided to the PSA for its review prior to its implementation. It was also noted that compliance with Condition 1 of the Targeted Review would require ACC to obtain independent legal advice. RAP suggested instructing a barrister from 39 Essex Chambers in London, as this barristers "set" is widely recognised as being one of the leading sets in the area of professional disciplinary and regulatory law.<sup>7</sup>

As a result of this suggestion, ACC instructed barrister Chiara Cordone of 39 Essex Chambers to prepare a note of advice on compliance with the terms of Condition 1(c) (*see above*), and specifically to provide advice in relation to the updating of the ACC's complaints process so as to ensure that any redesigned process would be compliant with the PSA's requirements. RAP also recommended that the counsel's opinion prepared by Ms Cordone be attached to the Condition One report to the PSA.

- **Condition 1(a) – reinstatement of original Complaints Process**

It was noted at the meeting on 30<sup>th</sup> September 2022 that the original Complaints Process had included a requirement for the Chair of RAP to be consulted about complaints decisions. This requirement had been removed in the revised process as RAP's view was that this was inappropriate: i.e. RAP should not be involved in individual complaints but, instead, should have an overview of the complaints process. RAP agreed to the temporary re-instatement of the original complaints process, as required by the PSA, including the role set out for the Chair of RAP within it.

- **Condition 1(b) – managing process for "live" complaints**

At the meeting on 30<sup>th</sup> September 2022, RAP was advised that there were currently four open complaints, two of which were at the early information-gathering stage. The proposal for these two complaints was to revert to the original complaints process: RAP agreed that this was reasonable. In relation to the other two complaints, in one case the complaint was already on hold due to the serious illness of the member involved. In the fourth case, the proposed approach, taking into account the history of the particular complaint, was for the planned appeal hearing to be cancelled, and for the panel to be disbanded, and then to start completely afresh with a new appeal panel, where legal representation would be permitted, and following the process as published in ACC's reinstated complaints policy. RAP agreed with the proposed approach in all four cases.

- **Condition 1(c) – Providing a plan for development of an updated complaints procedure**

It was noted by RAP that the PSA had accepted that, in relation to less serious complaints, a "mediated dialogue" approach was an appropriate principle to incorporate into the complaints process. However, in higher risk situations, where a registrant could lose their right to work by virtue of being struck off the register, then there would need to be a hearing attended by both parties, in

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<sup>7</sup> See <https://www.39essex.com/> and the relevant section of the Legal 500: 39 Essex Chambers is ranked as "Tier 1": <https://www.legal500.com/c/london-bar/professional-disciplinary-and-regulatory-law/>.



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order to ensure compliance with the spirit of the Human Rights Act 1998 (*as otherwise the right of reply would be undercut if a mediated dialogue approach were to be adopted*).

A point was subsequently raised at the February 2023 RAP meeting that registrants should be permitted to see the whole complaint that has been made against them, as a matter of natural justice: on this basis, RAP recommended sending the whole complaint form to the member against whom a complaint was being made. In addition, there were discussions around balancing confidentiality and the public interest, and RAP suggested that a hearing should only be in public if a member was at risk of being struck off. It was suggested that ACC adopt a 'realistic prospect' test in the complaints procedure, similar to that adopted by UKCP, or that it could introduce a category of 'minor/technical breaches' for issues where the member has fallen short of the required professional standards but which were not serious enough to require the formation of a formal complaints panel.

***The key actions arising from the above complaints procedure review process are set out in the Condition One report which was submitted to the PSA in January 2023, which was subsequently accepted by the PSA as fully satisfying the Condition which had been imposed.***

### **2.3 RAP's input re compliance with Condition Two of Targeted Review – GOVERNANCE & DECISION-MAKING**

#### **CONDITION 2**

***The ACC must provide a report on how it will amend its governance mechanisms to ensure clear and transparent decision-making on future changes to key regulatory processes, and compliance with our rules for Accredited Registers scheme will be achieved.***

***This must demonstrate insight of why the issues identified arose and include mechanisms to assure that the ACC's future actions are appropriately considered, recorded, and communicated.***

In relation to governance issues, there were detailed discussion at the RAP meeting on 30<sup>th</sup> September 2022 about how to build a stronger governance structure. One proposal was for individual members of the ACC's Board to be given governance responsibility for individual policy areas. In addition, RAP asked for specific training on the SRA Standards, and the evidence framework which accompanies them and, going forward, for any changes in either the Standards or the evidence framework to be brought to RAP's immediate attention.

In addition, the ACC's CEO stated that she would shortly be circulating a questionnaire to all RAP members (*as well as to the ACC's Board of Trustees and to the Senior Management Team*) with questions covering governance issues in order to gather data to feed into the Condition Two report required by the PSA's targeted review, and asked that all members of RAP respond to this questionnaire promptly (which they did).

RAP subsequently convened a supplementary meeting on 10<sup>th</sup> November 2022 specifically to discuss the responses to the various governance issues which had been identified in the survey, which would enable RAP to identify what changes needed to be made to the way in which RAP, and the ACC's



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Board of Trustees and Senior Management Team, operated and, based on these discussions, to formulate an action plan.<sup>8</sup>

Suggestions and comments made during this meeting included the following:

- Do we have the PSA Standards at the front of our minds in everything we do? (*There is a need to understand fully all the PSA Standards and how they impact on the work RAP does.*)
- There is a requirement for detailed minutes to be produced for all RAP meetings in a timely manner.
- The ACC Board should have a member that is specifically responsible for individual areas e.g. PSA, Data Protection etc. and for them to act as the “go to person” for that topic.
- The ACC Senior Management Team has asked the PSA to provide a seminar on the PSA standards.
- Should we be more proactive in meeting with other organisations to share ideas and good practice?
- What needs to be considered re RAP in the future, given that the value of RAP is to be independent and to be a second pair of eyes. (*RAP enables ACC to see things from a different perspective, from people outside the organisation, using their professional expertise which is outside that of the counselling profession. The Board of Trustees is internal; RAP is external.*)

In terms of the structure of the Agenda and Minutes for RAP meetings, it was agreed that the format of the minutes should be changed to include, for each agenda item, a brief summary of the discussion followed by: (1) any decisions made, and (2) any action points. In addition, for ease of monitoring actions over time, as well as including a “mini” table of actions at the end of each agenda point, a separate consolidated table of actions should be included at the end of the minutes, incorporating all open actions from previous meetings. In terms of the structure of the agenda for each meeting, RAP requested that the PSA Standards be included as a standing agenda item in all future meetings, and that a copy of these standards be circulated to RAP before each meeting, alongside the agenda and any other papers.

In terms of further demonstrating good governance (PSA Standard 6), it was agreed that the annual reports by the Chair of RAP to the PSA should be uploaded to the ACC website in redacted form, as these reports were a useful annual summary of the work being undertaken by RAP. It was noted that a set of principles in relation to the redaction of minutes of meetings of ACC’s Board of Trustees and RAP (for the purposes of uploading to the ACC’s website) was currently being drawn up by the ACC’s Chair of Trustees, and that these principles could also be applied to the redaction of the annual RAP report to the PSA.

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<sup>8</sup> A copy of the questionnaire and its results, as well as the minutes of the RAP meeting held on 10<sup>th</sup> November 2022 are contained in Appendices 1 and 2 respectively of the ACC’s Condition 2 report, submitted to the ACC in January 2023.



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*The key actions arising from the above governance review process are set out in the Condition Two report which was submitted to the PSA in January 2023 (which report was subsequently accepted by the PSA as fully satisfying the Condition which had been imposed) and are replicated below for ease of reference, with those of particularly relevance to RAP highlighted (i.e. in bold & underlined):*

1. selected board members will have explicit responsibility for ensuring that the standards for accredited registers are considered in depth when any policy or other relevant change is proposed that impacts on the register. Board members will also be responsible for monitoring changes to the standards and ensuring that these are properly assessed and implemented.
2. **a nominated board member will attend all Register Advisory Panel (RAP) meetings as an observer**, to develop knowledge and understanding of issues that impact on the register and be a link person between the Board and RAP.
3. the introduction of simple decision-making, impact assessment, and communication tools to aid a more systemic approach to decision making and to ensure that the impact of decisions on various stakeholders are properly considered, consulted and/or informed of changes.
4. **the structure of meeting papers, and agendas be changed to ensure that sufficient attention is given to issues that impact on the register and compliance with the accredited register standards.**
5. **minutes of meetings will be improved to ensure that the salient points in discussion on proposed actions and decisions are captured – providing an improved audit trail of decisions and their rationale.**
6. **provision of further internal training and awareness of the PSA's standards for accredited registers at all levels of the organisation.**

In relation to item (6), Melanie Venables (MV) and Dan Scott (DS) of the PSA's Accreditation Team were invited to attend the February 2023 RAP meeting to deliver a presentation about the PSA, including its history and its accreditation powers under Section 25(2) of the National Health Service Reform and Health Care Professions Act 2002.

RAP raised several queries following the presentation, such as: when ACC wishes to change any policies or procedures, how much information the PSA requires (*i.e. how is a balance achieved between providing enough information to fulfil the register requirements, but avoiding bombarding the PSA with too much detail*)? MV advised that the PSA are always willing to chat through what is needed, depending on the change being made.



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A query was also raised as to whether ACC was required to comply with obligations which are relevant to “public bodies”. MV stated that the PSA recognise that ACC is not necessarily a public body (although some PSA registers may be) adding that the situation was ‘complex’ but that there needed to be a recognition of the ‘spirit’ of accreditation and how ACC discharges its functions, depending on which aspects of the law were involved.

A question was asked regarding the PSA’s Quality and Improvement procedures and how the PSA moderates across different professional bodies. MV stated that this was a tricky area but that the rationale behind decisions, policies and procedures is considered – i.e. how does it fit with the ethos and what justification is that particular register making?

RAP queried how the PSA took into account the relative size and resources of professional bodies, as some relatively small organisations are constrained by lack of staff and/or financial resources. A specific example raised was in relation to the handling of complaints. MV suggested setting clearer thresholds for complaints, as long as a rationale for this is given. It was noted by RAP that a rationale can be quite subjective and that it is not an overall standard that can easily be met. MV stated that there were minimum requirements in place but acknowledged that she was hearing that more guidance was being requested, and also that she heard the point around proportionality.

A query was raised as to the approach which the PSA would advocate in relation to registrants’ social media and/or advertising claims. DS said there should be a proportionate sample checked to ensure that registrants were not advertising incorrectly or making inappropriate comments in public forums. He suggested that checks of websites and other public information should be added into the ACC’s processes at a proportionate and appropriate level.

Finally, a general question was raised as to whether it was likely that there would be a move to a statutory register. MV replied that she did not get a sense that this was a priority for the government.

### 3. REVIEW OF CURRENT COMPLAINTS

In addition to the regular review of open complaints, which is a standing agenda item at all RAP meetings, in November 2022 the ACC’s Chair of Trustees requested my input on whether a complaint against a registrant, which had been made more than 3 years after the issue complained of had occurred, should be investigated by the ACC. The ACC’s Chair of Trustees was minded to proceed with investigating the complaint, on the basis that the complaints policy included the wording ‘*normally heard within 3 years*’, thus allowing scope for a complaint to proceed beyond the 3-year period. I agreed with the rationale adopted, given the circumstances of the case, and the complaints process was initiated in this particular case.

More recently, two members of RAP were approached by an ACC registrant who is currently the subject of a complaint and who, by a process of triangulation using information available in the public domain, had managed to obtain contact details (telephone number/e-mail) for two members of RAP, and then, concerningly, had proceeded to made contact with them in order to discuss the complaint which had been made against him. The member has also made two Subject Access Requests to ACC. I advised all members of RAP to ignore any further attempts being made by this





individual to contact them. Additionally, RAP members were asked to check their biographies on the ACC website to ensure that they were fully up-to-date.

#### **4. ACC REBRAND**

At the June 2022 RAP meeting, the ACC's CEO shared the new ACC name ("*Association of Christians in Counselling and Linked Professions*") and logo with RAP. In response to a query from RAP relating to the change in name of the legal entity, the Chair of Trustees confirmed that the new name had been approved by Companies House, the Office of the Scottish Charities Regulator and the Charity Commission. In addition, a legal review of the ACC's constituent documents was due to take place in 2023 with the aim of "future-proofing" the company's articles by potentially extending the ACC's scope of operations in relation to its charitable objectives and introducing additional membership streams. RAP advised keeping the PSA closely informed in relation to these proposals, and was assured that ACC would be doing so, including in relation to any policies which would potentially impact the PSA standards.

#### **5. ACC NEW WEBSITE**

Progress reports on the development and implementation of the ACC's new website was a standing item at all RAP meetings during the current accreditation year. Although there have been some delays with implementation, it is anticipated that the 'go live' date will take place in June or July 2023. The new website will be a significant improvement to the current system, which has been having occasional system outages, demonstrating that the current system is operating "on borrowed time".

#### **6. ACCREDITATION AND EQUIVALENCE OF QUALIFICATIONS – SCoPEd FRAMEWORK**

The Scope of Practice and Education (SCoPEd) framework is a shared standards' framework, developed by six PSA-accredited bodies, including ACC, setting out the core training, practice and competence requirements for counsellors and psychotherapists working with adults.

The January 2022 issue of the SCoPEd framework incorporated a number of significant updates and improvements since the previous version of the framework was published in July 2020. HC, a member of RAP and the author of the Churchill Framework, is (along with the ACC's CEO) the ACC's representative on the SCoPEd technical steering group. Following the publication of the January 2022 SCoPEd framework, which marked the delivery of phase one work on SCoPEd, the project moved to phase two, which includes creating a shared set of principles – based around fairness, inclusion and transparency – for implementing the framework, and working towards agreed entry points and gateways between the different tiers of competencies. HC reported that there was more work to be done in detailing how the framework would be implemented and adopted by the different membership bodies, but that the membership bodies had been working closely together on this to find shared ways forward where possible, while still retaining individual identity.



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## 7. MEMBERSHIP STATISTICS

A further standing agenda item at RAP meetings was a review of membership statistics. As requested by RAP, this now includes a rolling report on membership numbers, in addition to a “snapshot” of current numbers. RAP has requested that details of individual membership categories be added to these reports, and also for details to be provided to RAP of register applicants whose membership application has not been approved, and the reason why. RAP has also recommended that ACC produce a policy for register applicants applying to join after a gap in practice.

## 8. SUMMARY

In my last annual report to the Professional Standards Authority’s Accreditation Team, dated 27 April 2022, I stated that the focus for RAP for the accreditation period 2022-2023 was as follows:

- To undertake its responsibilities as set out in its Terms of Reference;<sup>9</sup>
- To monitor ACC’s implementation of matters agreed by RAP; and
- To be responsive to issues raised by ACC’s Chair, CEO and/or Registrar in relation to the ACC’s register, risk management and the protection of the public.

Looking forward to the next 12 months, RAP intends to carry out the following roles:

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

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*Catherine Clarke*

**Catherine Clarke, Chair of the ACC’s Register Advisory Panel**

**10 May 2023**

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<sup>9</sup> For ease of reference the various tasks which RAP is required to carry out, as set out in its TOR, are listed in the Appendix to this report.



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## APPENDIX

### Extract from Register Advisory Panel's terms of reference

#### Tasks of the Register Advisory Panel

- Review and approve proposed changes to the counselling ethics and practice standards and policies/guidelines<sup>10</sup> of ACC's Register of Counsellors to ensure that they comply with the ethos of 'right touch regulation' and specifically the standards and requirements for accredited voluntary registration as published by the Professional Standards Authority (PSA).
- Ensure ongoing quality and integrity of registration, accreditation, audit and complaints processes (including the register application and renewal processes), ensuring compliance with equality legislation.
- On a regular basis, review audit activity and outcomes to identify risks and issues which will drive standards, policies/guidelines, and process improvements.
- On a regular basis, review a summary of complaint activity and outcomes to identify risks and issues which will drive standards, policies/guidelines and process improvements.
- Review complaint appeals relating to compliance with process.
- On an annual basis, identify, review and evaluate risks as they apply to the Register.
- On an annual basis, submit a report for ACC's Board and for the PSA on the work of the RAP.
- Consider the impact on ACC's register of relevant changes to the current regulatory system and advise accordingly.
- Support public engagement activities relating to ACC's register and the PSA's work with accredited registers.

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<sup>10</sup> Practice Standards and Guidelines include but are not limited to ethics, CPD, supervision, insurance, record keeping, practice breaks, duty of candour.