

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 2018 - 2019

1. I took over the role of Chair of the RAP on 1 June 2017 from Fiona Sherburn.
2. The first RAP meeting under my chairmanship took place on 22 September 2017. Since then, further meetings have taken place on 12 January 2018, 13 April 2018 and 9 November 2018. The next RAP meeting is scheduled to take place on 3 May 2019. Each meeting typically lasts for 3 hours.
3. The current members of the RAP with voting rights are Catherine Clarke, Doreen Rowland (DR), Heather Churchill (HC) and Richard Needle (RN). DR and HC became members of the RAP at approximately the same time as I did, and our roles as Chair/member were ratified by the ACC Board at its Board Meeting on 20 September 2017. RN became a member in 2018, and his role was ratified by the ACC Board at its Board Meeting on 24 April 2018.

All voting members have attended all meetings since becoming RAP members. The above meetings were also, subject to occasional apologies, attended by Tony Ruddle, ACC Executive Chair, Kathy Spooner, ACC Director of Counselling and Dawn Sherry, ACC Registrar (*each of whom is a non-voting member*).

4. The main work undertaken by the RAP since my appointment 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, particularly in relation to complaints – both against individual counsellors who are members of the ACC, and against the ACC itself.
5. In summary, the main tasks undertaken by the ACC in relation to the register since the start of my chairmanship are as follows:
 - A statement was promulgated by the RAP that, in the event of any disagreements between the RAP and the ACC Board, the RAP would take such issues direct to the PSA;
 - The terms of reference (ToR) of the RAP were reviewed and updated, to ensure that they fully reflected the PSA's requirements regarding the role and

responsibility of the RAP, and a requirement was introduced that the ToR be reviewed on an annual basis going forward;

- The selection criteria for membership of the RAP were reviewed and updated, and a requirement was introduced that they be reviewed on an annual basis going forward;
- The RAP recommended to the ACC Board that the Complaints Procedure and Indicative Sanctions protocol which is applicable to individual counsellors be amended to enable clients to raise a complaint up to 3 years (rather than 2 years, as at present) after the end of a counselling relationship. This recommendation was accepted by the ACC Board at its Board Meeting on 24 April 2018;
- The RAP recommended to the ACC Board that the percentage of register renewals selected for audit on an annual basis be decreased from 20% to 10%, as the RAP considered this to be an unduly onerous requirement, and because a requirement to audit 10% of the membership annually would bring it more into line with the arrangements put in place by other PSA-accredited registrars. This recommendation was accepted by the ACC Board at its Board Meeting on 24 April 2018;
- 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, and that a protocol be drafted setting out the criteria by which members are selected for audit, and the extenuating circumstances (e.g. serious illness) in which the audit process could be postponed.
- The RAP recommended to the ACC Board 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;
- The RAP recommended to the ACC Board 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*);
- The RAP recommended to the ACC Board 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;
- The RAP recommended to the ACC Board that guidance be produced for counsellors as to what can and cannot be stated on their individual "Find a Counsellor" page;
- The RAP recommended to the ACC Board that criteria be formulated relating to the selection of appropriate sponsors on the New Registrant Application Form.

6. In September 2018 a complaint was made against the Executive Chair and Vice Chair of the ACC Board by another member of the ACC Board disputing the basis of the entitlement to surplus funds resulting from National Mindfulness Events held in May 2018. The ACC Board initiated an independent review of the complaint, and also asked the RAP for its views on learning points to be taken from the complaint.

The RAP met on 9 November 2019 to discuss this matter and made the following recommendations to the ACC Board:

- To consider whether there is a requirement to inform the Charity Commission of the complaint;
- To review the Terms of Reference for Board Members;
- To review and refresh conflicts of interest at every Board meeting;
- To re-do central Conflict of Interest Register annually;
- Any future projects undertaken by ACC to have written Terms of Agreement.

The ACC Board also agreed to include the RAP in the process of investigating any future complaints which may be brought against the ACC, to enable the RAP to undertake an assessment on whether such a complaint could pose a risk to the register (and for no other purpose).

7. The RAP requested evidence from the ACC Board that the ACC was fully compliant with the General Data Protection Regulation (GDPR) and was advised by the ACC Board as follows:

“As part of the work to become complaint with GDPR, ACC has:

- a. reviewed the legal basis on which personal data was held and processed;*
- b. the legal basis and retention policy for each membership category and for members of the public was approved by the ACC Board;*
- c. sought approval to retain personal data from all non-members;*
- d. revised and updated the ACC database in line with whether approval was gained or not;*
- e. conducted an audit on the data fields held for members and will remove unnecessary data fields;*

in the process of reviewing all policies and procedures relating to the processing and holding of data.”

[cont.]

Looking to 2019-2020

The focus for the RAP in the coming period will be to:

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

I confirm that, as Chair of the ACC's Register Advisory Panel, I am satisfied with the arrangements which have been put in place for the management of ACC's Register of Counsellors for the Accreditation Year 2018 to 2019.

Catherine Clarke

Catherine Clarke

19 March 2019