

Accredited Registers

Conditions Review: British Association of Counselling and Psychotherapy (RWPN)

1. Outcome

- 1.1 At the RWPN's initial accreditation, the Professional Standards Authority issued several Conditions on its accreditation. When the evidence for these Conditions was first considered in September 2023, we found that Conditions 7, 8, 9 and 12 were only partially met, and decided to reissue them, newly numbered as Conditions 1 to 4¹.
- 1.2 This report sets out our assessment of the further actions taken by the RWPN to satisfy the Conditions.
- 1.3 We found that the RWPN had met conditions 1 to 4.

2. Background

- 2.1 We assess registers against our *Standards for Accredited Registers* ('the Standards')² Where a Register has not met a Standard, we can issue Conditions. A Condition sets out the requirements and the timeframe that a Register must meet.
- 2.2 At the RWPN's initial accreditation, completed in March 2022, we issued Conditions on its accreditation (a full list is published on the RWPN's directory page [rehabilitation-workers-professional-network-accreditation-decision.docx \(live.com\)](#)).
- 2.3 When the evidence for these Conditions was first considered in September 2023, we found that Conditions 7, 8, 9 and 12 were only partially met, and decided to reissue them, with some minor revisions to reflect work achieved to date. These were issued as the newly numbered as Conditions 1 to 4, as below:
 - **Condition 1:** The RWPN should publish its processes for registration and renewal, (including information about the decision makers) and update the information on its website to make clear what its registration requirements are for the public. The RWPN should develop a policy for assessing applicants who have trained with another provider for example those who have studied abroad.
 - **Condition 2:** The RWPN should develop of policy for handling positive declarations.
 - **Condition 3:** The RWPN should develop and publish an appeal policy for registration decisions.

¹ See report at: [accredited-registers-rwpn-conditions-review.docx \(live.com\)](#)

² The RWPN were originally assessed against the *Standards for Accredited Registers* (April 2016). https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/standards-for-accredited-registers-2016.pdf?sfvrsn=cfae4820_4

- This report discusses the actions RWPB took to address the Condition, as well as our decision about whether the Condition is met.
- 2.4 We reviewed the following evidence in determining whether the Conditions had been met:
- a) The RWPB's reported actions about what it had done to meet the Conditions.
 - b) The RWPB's Indicative Resolutions and Sanctions Guidance
 - c) The RWPB's Registration and renewal Policy

3. Concerns leading to the Conditions

- 3.1 At its initial accreditation we noted that the RWPB has processes in place for assuring itself that registrants meet its standards for registration. The RWPB requires registrants to provide evidence of qualifications and has a policy in place for those who have completed accepted training but who cannot provide certificates. However, the RWPB did not have a formal process in place for assessing people who have applied with certificates from other providers such as those who have trained overseas. It had not published information about its application and renewals processes and did not have a mechanism for appealing registration decisions.
- 3.2 At its initial accreditation, we noted the RWPB required applicants and renewing registrants to sign to say that they have read and understood its *Code of Ethics and Professional Conduct* but did not ask about any other declarations.
- 3.3 At its initial accreditation, we noted the Initial Investigation Panel may issue resolutions to the registrant who is subject to a complaint where they have found that a case is upheld but where they have decided not to submit to the Professional Conduct Panel. These resolutions were not published. The Accreditation Panel suggested that the RWPB should consider whether it's in the public interest to publish resolutions. The Panel noted that the Indicative Resolutions and Sanctions Guidance could include more flexibility, for example publishing the outcomes of the IIP when it is in the public interest or when the RWPB wants to send a message to the membership.

4. Assessment of the Conditions

- 4.1 The RWPB provided its response to the Conditions on 15 January 2024.
- **Condition 1:** The RWPB should publish its processes for registration and renewal, (including information about the decision makers) and update the information on its website to make clear what its registration requirements are for the public. The RWPB should develop a policy for assessing applicants who have trained with another provider for example those who have studied abroad.
- 4.2 The RWPB informed us that its Registration & Renewal Policy has been updated and is accessible via its website ([Registration and Renewal Policy.pdf \(rwpb.org.uk\)](https://www.rwpb.org.uk/Registration-and-Renewal-Policy.pdf) <https://www.rwpb.org.uk/Professional-Register1>)

- 4.3 The guidance includes new detail about the decision makers at key points in the registration process.
- 4.4 This includes a new section outlining how the RWPB will consider qualifications gained overseas. The policy makes clear that the new appeals process (see Condition Three, below) also applies to those applying through this route.
- 4.5 The guidance also includes a new section about renewing registration. This Provides a mechanism for the RWPB to check on an ongoing basis that registrants continue to agree to abide by the Code of Ethics and Professional Conduct and that there are no new declarations to be made, such as actions by other regulatory bodies.
- 4.6 The RWPB informed all registrants of these changes in a mailout in November 2023.
- **Condition 2:** The RWPB should develop of policy for handling positive declarations.
- 4.7 The RWPB informed us that its Registration & Renewal Policy has been updated with the relevant fitness to practice declarations and we have seen that these are also accessible via its registration and renewals policy on website ([Registration and Renewal Policy.pdf \(rwpb.org.uk\)](https://www.rwpb.org.uk/Professional-Register1) <https://www.rwpb.org.uk/Professional-Register1>). The RWPB also informed all registrants of these changes in a mailout last November. The RWPB also provided us with its updated Rules of membership and registration: https://www.rwpb.org.uk/join_now.
- **Condition 3:** The RWPB should develop and publish an appeal policy for registration decisions.
- 4.8 The revised registrations and renewals process includes a mechanism for appealing registration decisions. Appeals are considered by the Registration and Professional Standards Committee. This is separate from the decision maker about registration decisions, who is the Membership Secretary. However, we considered that it would be beneficial to have further separation in terms of decisions about appeals, and issued the following Recommendation:
- Recommendation One:** To ensure complete separation of involvement in the process and responsibilities for decision-making at registration with those at appeal.
- 4.9 The policy does not set out the grounds for appeal, which can therefore be assumed as broad. We have issued the following Recommendation to address this:
- **Recommendation Two:** The RWPB should set out clearer grounds for appealing registration decisions.
 - **Condition 4:** The RWPB should review its indicative sanctions guidance to ensure that it has enough flexibility for the RWPB to act in different situations. The RWPB should review if sanctions issued by the Initial Investigation Panel (IIP) should be published taking the public interest into account. The RWPB should consider if the Professional Conduct Panel (PCP) can decide not to

issue a sanction, and if so, include information about this within its complaints policies.

- 4.9 The RWPN provided a copy of its Indicative Complaint Resolutions and Sanctions Guidance which clarified that sanctions against all registrants will be published on the RWPN website, and that investigating panels will have a wide discretion as to if and when to issue a sanction, and the type of sanction to be issued if so.
- 4.10 We noted that although sanctions must be published, resolutions are not. Resolutions include written warnings relating to concerns that are not considered serious in nature, further training requirements, and apologies. We considered that further training or development might indicate insufficiencies in a registrant's practice, and issued the following Recommendation:
- **Recommendation Three:** The RWPN should consider whether resolutions for further training or development should be published.

5. Conclusion

- 5.1 The RWPN has carried out the actions required by the Conditions. we will check that the RWPN continues the required actions at its next assessment.
- 5.2 We therefore found that the Conditions have been met.