

## Accredited Registers

### Condition Review: UK Board of Healthcare Chaplaincy (UKBHC)

#### 1. Outcome

At UKBHC's accreditation renewal, the Professional Standards Authority ('we') issued 12 Conditions on its accreditation, three of which were to be completed by 30 April 2024, seven to be completed by 31 July 2024, and two to be completed by the time of their next assessment in November 2024 (see paragraphs 2.3, 2.6, 2.13, 3.3, 3.7, 4.8, 5.3, 5.13, 5.19, 6.6, and 7.2 of the published outcome).

This report sets out our assessment of the actions taken by UKBHC to satisfy the Conditions.

We found that UKBHC had met Conditions 1, 2, 4, 5, 6, 7, 8, 9, and 11 and had not met Conditions 3, 10 and 12.

#### 2. Background

We assess registers against our *Standards for Accredited Registers* ('the Standards')<sup>1</sup>. 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.

At UKBHC's accreditation renewal, completed in November 2023, we issued 12 Conditions (a full list is published on UKBHC's directory page: [UK Board of Healthcare Chaplaincy](#)). Conditions 5, 8, and 12 had to be implemented by 30 April 2024; Conditions 1, 2, 3, 4, 6, 9, & 10 had to be implemented by 31 July 2024; and Conditions 7 and 11 had to be implemented by the time of their next assessment in November 2024:

- 1) The UKBHC must clarify the basis for its position on whether or not membership of an organised religious or faith group is a requirement of registration.
- 2) The UKBHC must develop and publish an appeals process for registration decisions.
- 3) The UKBHC must develop mechanisms to check for relevant disciplinary outcomes from accredited registers and other regulatory bodies for applicants or registrants.
- 4) The UKBHC must develop formal agreements for its registrants to ensure that there is a clear basis for the full range of registrant requirements, beyond the Code of Conduct.

---

<sup>1</sup> The UKBHC were originally assessed against the [Standards for Accredited Registers \(April 2016\)](#)

- 5) The UKBHC should develop a safeguarding policy that sets out its role and responsibilities in relation to safeguarding concerns. Its codes, registration, and complaint procedures should integrate with this and make clear what the expectations for registrants are in terms of safeguarding.
- 6) UKBHC should set explicit requirements for registrants to hold appropriate indemnity cover (whether that be through a membership organisation, employer, or other means).
- 7) The UKBHC should develop a process for how it assures the quality of the education courses it accredits for entry into its register and assess applications for registration from people who have not qualified through one of its approved education providers.
- 8) UKBHC should ensure that its complaints process is accessible and responsive. Its guidance for the public should be clear and up to date with correct details of key roles such as the Registrar, and support should be available by telephone as well as email.
- 9) UKBHC must publish disciplinary outcomes on its register, so that anyone checking a registrant can clearly see if a sanction has been imposed.
- 10) The UKBHC must develop its policy for reporting relevant complaint outcomes to appropriate bodies, including the Accredited Registers. It must also show evidence of how it works with the NHS and other employers to share and investigate concerns about registrants.
- 11) The UKBHC should publish Board minutes to date (or relevant extracts as related to its public protection role) from its governance meetings to improve the transparency of its decision-making.
- 12) The UKBHC should review and update its Risk Matrix to ensure that the safeguarding risks and mitigations are properly captured and that the scores fully reflect the risk.

This report discusses the actions UKBHC took to address the Conditions, as well as our decision about whether the Conditions are met.

We reviewed the following evidence:

- a) UKBHC's reported actions about what it had done to meet all Conditions: submitted on 18<sup>th</sup> June 2024
- b) UKBHC's reported actions about what it had done to meet all Conditions: submitted on 21<sup>st</sup> June 2024
- c) Information provided to the team by the UKBHC, submitted on 24<sup>th</sup> July 2024

- d) UKBHC's reported actions about what it had done to meet all Conditions: submitted on 14<sup>th</sup> August 2024
- e) UKBHC's Website: [UK Board of Healthcare Chaplaincy](#)
- f) UKBHC's Complaints Procedure
- g) UKBHC's Safeguarding Policy

### 3. Concerns leading to the Conditions

3.1 The following are the concerns leading to each of the Conditions:

- *Condition 1*

Practitioners applying to join the UKBHC's register are required to show evidence of a recognised or accredited status within a mainstream faith community or belief group, which can also include from the Humanist Society. The UKBHC told us that they will be reviewing whether this requirement should remain. We think it is important that the UKBHC has a clear basis for the requirement.

- *Condition 2*

The UKBHC does not currently have an appeals process in place for registration decisions. We were concerned that this would prevent an applicant who is refused registration from raising a challenge to the decision.

- *Condition 3*

The registration criteria include a requirement for "no known existing issues with professional conduct." The UKBHC acknowledged that it does not yet have a formal procedure for recognising decisions regarding professional conduct made by regulatory bodies and other accredited registers. It advised us that this will be included in its new registration process. This is particularly relevant for registrants who have one or more additional registrations.

- *Condition 4*

We noted that there is no formal contract or agreement defining the terms and conditions of registration. The UKBHC informed us that registrants must complete a pro-forma document agreeing to abide by the UKBHC Code of Conduct. Although the Codes reflect the general conduct of chaplains, for example the registrant responsibility for maintaining relationships between chaplains and those in their care, personal and professional boundaries, they do not make explicit other requirements such as compliance complaints processes.

- *Condition 5*

The nature of the work of chaplaincy and the likelihood of close contact with children and vulnerable adults highlight the importance of having clear and robust safeguarding policies. This also underlines the need for the UKBHC to be accessible by phone as well as by email for the reporting of urgent concerns.

We found that the following Recommendation issued under Standard One in March 2023 did not appear to have been considered.

- Recommendation (Standard one): The UKBHC should consider developing a policy/procedure about how it as an organisation would handle a safeguarding concern it became aware of through its register functions.

However, the UKBHC told us that they are in the process of appointing an officer for safeguarding concerns. We are escalating it because a) there's no evidence they've considered the recommendation and b) there is a broader concern about their safeguarding arrangements resulting in us issuing a Condition.

- *Condition 6*

We checked if registrants are required to hold indemnity insurance. The UKBHC advised that some registrants are also members of the College of Healthcare Chaplains and would have indemnity through that membership. The UKBHC will review this requirement at their December 2023 Board meeting. The Accreditation Panel determined that it is important to ensure that all registrants have appropriate indemnity insurance, recognising that not all will be members of the College of Healthcare Chaplains.

- *Condition 7*

We noted that applicants who could not provide evidence of the required qualifications and experience could apply through an equivalence route. The UKBHC has appointed an academic advisor to consider the equivalence of academic qualifications and experience to meet the registration criteria and to advise the registrar. However, no information is published about the criteria used by the academic advisor for assessing these applications. The UKBHC should make this clear to members of the public and potential applicants.

- *Condition 8*

The complaint policy sets out that complaints may be made verbally or in writing and should also be accepted via any other method, for example, the telephone or electronically. We noted that to enable this, the complaint policy should have a phone number and current key official's email addresses. UKBHC confirmed that they are going to publish a phone number on its new website.

- *Condition 9*

We noted that the UKBHC's disclosure policy states that registrants who have been removed from the register will not have their names displayed. The UKBHC will keep a record of these chaplains and make them available, on request, to the UKBHC Registrar. The Accreditation Panel considered it is important that the public, and employers, are aware when registrants have been removed from the register since this may relate to disciplinary outcomes. This can be achieved by publishing the outcomes from disciplinary hearings, and having a process in place to determine when it is not appropriate to do so.

- *Condition 10*

We determined that having procedures in place for sharing regulatory outcomes with relevant bodies is an important part of safeguarding, as considered under Standard Three. Given that the UKBHC expects many complaints to be resolved at the employer level, this needs to include arrangements for sharing concerns with NHS bodies. The UKBHC has told us it has not considered any complaints about registrants during the past two years. This raises a question about the extent to which it is currently engaging with employers.

- *Condition 11*

Up until June 2020, Board minutes could not be accessed on the UKBHC website. The UKBHC told us that the minutes of each board meeting would be accessible on the new website.

- *Condition 12*

As set out for Standard One, the UKBHC manages a risk register that covers potential risks arising from registrants' professional practice. The risk register is reviewed by the UKBHC's board on a regular basis.

We assessed how the UKBHC mitigates risks relevant to the practice of its registrants' work within our assessment of Standard One, published in March 2023. We issued the following recommendation:

- Recommendation (Standard One): The UKBHC should review and update its Risk Matrix to ensure that the safeguarding risks and mitigations are properly captured and that the scores fully reflect the risk.

We found that this had not been considered. The Accreditation Panel decided to reissue this as Condition 12, which will also support the Condition 5 issued under Standard Three on Safeguarding.

3.2 Further details can be found under Standards 2, 3, 4, 5, 6 and 7 of UKBHC's accreditation renewal outcome<sup>2</sup>.

#### 4. **Assessment of Conditions 1 - 12**

UKBHC provided its response to the Conditions on 18<sup>th</sup> June 2024, 21<sup>st</sup> June 2024, 24<sup>th</sup> July 2024, and 14<sup>th</sup> August 2024.

- *Condition 1 – Condition Met*

UKBHC clarified their rationale for requiring applicants to be endorsed. We are now clear that the justification for the endorsement is predicated on public protection grounds. For this reason, the Panel accepted that this Condition has been met.

- *Condition 2 – Condition Met*

In an email dated 27<sup>th</sup> August 2024, UKBHC informed us after further enquiry that their registration policy has been updated to encompass an appeals process as approved by the Board and that this has been uploaded to the website. We checked and were able to confirm that indeed this was the case. The Panel accepted that this Condition has been met.

- *Condition 3 – Condition Not Met*

The Panel did not accept the rationale in the assessment report that Condition 3 was met. The Panel considered that the UKBHC was required to demonstrate mechanisms to check relevant disciplinary outcomes for regulatory bodies and that joining the Information Sharing Protocol only covers Accredited Registers. Therefore, the condition is not met. The Panel noted that Conditions 3 and 10 were linked and should be merged.

- *Condition 4 – Condition Met*

Following confirmation from UKBHC in the email of 27<sup>th</sup> August 2024 that the registration process has been updated to include an agreement/contract with registrants as approved by the Board, we verified that this was the case, and that the website has been accordingly updated. The Panel agreed that this Condition has been met.

- *Condition 5 – Condition Met*

We confirmed that UKBHC has developed a comprehensive Safeguarding policy that clarifies the expectations for registrants, and this has now been uploaded to its website. This Condition is now, therefore, met. The Panel noted, however, that the assessment report had to be updated on the day of the Panel to reflect the publication of the Safeguarding policy on the UKBHC website.

---

<sup>2</sup> [Panel Report Full Assessment \(Std 1-8\) UKBHC.docx](#)

- *Condition 6 – Condition Met*

Following the email communication of 27<sup>th</sup> August 2024, we confirmed that UKBHC has indeed developed an indemnity insurance policy as a condition for registration, and this has been uploaded on their website. The Panel accepted that this Condition has been met.

- *Condition 7 - Condition Met*

After their second submission of evidence, we checked the UKBHC website and confirmed that a process for assuring the quality of the education courses it accepts for entry into its register has been developed and published. We also checked and confirmed that the UKBHC now has equivalence routes for entry into its register. For those who are applying and meet all the criteria except the Postgraduate Certificate, the Register offers Provisional Registration even if they are not currently pursuing a Postgraduate Certificate. They have also developed detailed criteria for equivalence for non-accredited Postgraduate awards presented in support of an application for full registration. The Panel decided that this Condition has, therefore, been met.

- *Condition 8 - Condition Met*

Following a communication on 27<sup>th</sup> August 2024, we checked and confirmed that the UKBHC website now lists several key roles and their email addresses to be contacted in the event of a member of the public wanting to make a complaint. This makes its complaints process accessible and responsive. The Panel accepted that this Condition has been met.

- *Condition 9 - Condition Met*

We checked the Register page of the website and confirmed that reference to sanctions has indeed been added to enable anyone checking a registrant to clearly see if a sanction has been imposed. The Panel accepted that the Condition has been met. However, the Panel felt that in the response to Condition 9, the information shared pointed to a lack of clarity over presentation of information about publication of sanctions, which appeared only to be presented in the case of Dual Registration. The Panel determined that a recommendation should be issued to make this information clearer.

**Recommendation:**

UKBHC should ensure that the text on sanctions, which reads “*If a Board Registered Chaplain has been disciplined, suspended, or removed, that designation will be shown beside the chaplain’s name together with the date of same*”, should be relocated away from its current page (Dual Registration) to a more appropriate page on the UKBHC website to make it more visible and accessible to the public

- *Condition 10 – Condition Not Met*

It is the case that UKBHC has signed up to the Accredited Registers Information Sharing Protocol. The Condition, however, requires a UKBHC policy that goes beyond the Accredited Registers and share information with the NHS and other



bodies (social services, the police, etc), which they have not put in place. The Panel accepted the rationale in the assessment report that Condition 10 was not met. The Panel again noted that Conditions 3 and 10 were linked and should be merged.

- *Condition 11 - Condition Met*

We checked the UKBHC website and confirmed that indeed the minutes of Board Meetings dating back to 2012 have now been published. This would improve the transparency of UKBHC's governance decision making. The Panel, therefore, accepted the rationale in the assessment report that Condition 11 was met.

- *Condition 12 – Condition Not Met*

UKBHC submitted no evidence of action on risks. We were simply informed that an updated risk matrix remains outstanding, that several people are willing to work on it, and that this was work in progress. We, therefore, have no way of knowing if its risk matrix is up to date. The Panel noted that this Condition was due to have been acted upon by April 2024 due to its seriousness for public protection. It remains not met six months after the deadline. The Panel also noted that the work related to the Condition is expected to be an ongoing activity of the Board and that it is anomalous that a routine activity is so delayed. The Panel consequently accepted the rationale in the assessment report that this Condition was not met.

## 5. Conclusion

The Accreditation Team outlined the options for the Panel's consideration based on the recommendation that some conditions had not been met. The Panel considered each of the options in turn. Their rationale for their decision is provided immediately below:

- *Determine the Conditions had actually been met*

The Panel considered the evidence and recommendations of the Accreditation Team and agreed that conditions 3, 10 and 12 had not been met. Therefore, the Panel could not reasonably reach this outcome.

- *Re-issue Conditions with a new deadline*

The Panel acknowledged that the UKBHC had made efforts to successfully meet the majority of the conditions that had been placed on them, in the context of a change in leadership owing to the former Chair needing to leave his post for personal reasons. The Panel considered that the responses to conditions for some of the most urgent matters suggested that although this outcome is appropriate, that there is reason to consider outcomes that recognise that important conditions that affect public protection and confidence had not been met.



The Panel discussed that if this outcome was reached that the conditions should be reissued with stretching deadlines that at once did not disadvantage the UKBHC but also did not permit continued non-compliance for a protracted period.

- *Consider suspension of Accreditation to provide time for Conditions to be met*

The Panel acknowledged that one of its options was to suspend accreditation and considered whether it was reasonable. The Panel considered that the work to meet the conditions should be able to be completed within a short duration of time. Therefore, any suspension would necessarily be short (less than three months). The Panel considered that the impact of a suspension of accreditation on the UKBHC would be disproportionate, especially if it were short, to manage the risks of ongoing non-compliance.

- *Consider withdrawal of Accreditation*

The Panel felt that this outcome would have a disproportionate impact on UKBHC, its registrants and employers of registrants. While there were matters of public protection included in the subjects of the outstanding conditions, the effect of withdrawing accreditation would not be proportionate to managing those risks.

### **Decision/Outcome**

Overall, the Panel reached the conclusion that Conditions 3, 10 and 12 have not been met and must be re-issued with a 2-month deadline. This was considered to be the most proportionate means to assure compliance with the standards. However, the Panel wished to indicate that any further failure to meet the conditions would leave a future Panel with limited options but to consider suspension or withdrawal of Accreditation.

The Accreditation Team also stated that work would soon commence for a Targeted Review to coincide with the upcoming Annual Check. To minimise the burden on the UKBHC, the condition review, Annual Check and Targeted Review will be managed together in one assessment.

The Panel also directed that conditions 3 and 10 should be merged into a single condition. We, therefore, re-issued Conditions 3, 10 and 12 as follows:

- **Condition 1 (Conditions 3 and 10 merged):**  
UKBHC must develop mechanisms to check for and report relevant disciplinary or complaints outcomes to appropriate bodies, including the Accredited Registers and other regulatory bodies. It must also show evidence of how it works with the NHS and other employers to share and investigate concerns about applicants or registrants.

- **Condition 2 (Condition 12 re-issued)**

UKBHC should review and update its Risk Matrix to ensure that the safeguarding risks and mitigations are properly captured and that the scores fully reflect the risk.

Both Conditions should be completed within two (2) months of publication of this report.

We also make the following recommendation:

- **Recommendation (Standard 5, Condition 9)**

UKBHC should ensure that the text on sanctions, which reads “*If a Board Registered Chaplain has been disciplined, suspended, or removed, that designation will be shown beside the chaplain’s name together with the date of same*”, should be relocated away from its current page (Dual Registration) to a more appropriate page on the UKBHC website to make it more visible and accessible to the public