



acc

Association of
Christians in Counselling
and Linked Professions

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 2023 – 30 APRIL 2024**

Executive summary

This report provides an overview of the work and activities of the Register Advisory Panel (RAP) of the ACC during the accreditation year 2023-2024. The RAP is an independent panel which advises and oversees the ACC in relation to the holding by it of an accredited register of counsellors, ensuring that it meets the standards and requirements for accredited voluntary registration as promulgated by the PSA.

This report covers the following areas:

1. Purpose of RAP and RAP Terms of Reference (TOR)
2. RAP meetings during current accreditation year
3. Updating of RAP Terms of Reference (*and related governance documents*)
4. (New) Conflicts of Interest policy
5. PSA standards and guidance
6. PSA targeted review
7. Redrafting of Complaints Policy
8. Review of live complaints
9. Notification of Change: Accreditation and Equivalence of Qualifications (SCoPEd Framework)
10. Membership statistics, audits, etc.
11. Organisational issues (*including new website*)
12. ACC Risk Register
13. External projects and partnerships
14. RAP succession planning

Conclusion



acc

Association of
Christians in Counselling
and Linked Professions

1. Purpose of RAP and RAP Terms of Reference (TOR)

PURPOSE OF RAP

The purpose of RAP is to hold ACC to account in terms of how the ACC maintains the standards required by the PSA for ACC to continue to hold a register of counsellors which is accredited by the PSA, and thereby to protect the integrity of this accredited register for the protection of the public.

In doing so, RAP acts as a “critical friend” to the board of the ACC, by supporting it in maintaining and, where appropriate, improving its processes in relation to its accredited register. Members of RAP serve in a voluntary capacity. The Ethics, Policies and Governance page on the ACC’s website¹ sets out further details of the role carried out by RAP, in addition to including links to the Terms of Reference (TOR) of RAP (*and other governance-related material*), the current membership of RAP, minutes of RAP meetings, and copies of the Chair of RAP’s annual reports to the PSA.²

The precise role of RAP is set out in its TOR, which were updated in April 2023 to reflect the updated wording of the PSA’s revised accredited register standards. (*A further update of RAP’s terms of reference took place later in 2023 – see further below.*) The main tasks of RAP are to review and approve proposed changes to the counselling ethics and practice standards and policies/guidelines of ACC’s register; to ensure ongoing quality and integrity of registration, accreditation, audit and complaints processes; to review and evaluate risks as they apply to the register; to submit an annual report to ACC’s board and the PSA; to consider the impact of relevant changes to the current regulatory system; and to support public engagement activities relating to ACC’s register and the PSA’s work with accredited registers.

In addition to ensuring that robust arrangements are in place to maintain the integrity of the accredited register (*e.g. in terms of the policies and processes which are put in place to vet the qualification of individuals applying for entry to the register - including via the equivalence route, where an individual is already registered with another counselling organisation which also maintains an accredited register; the ongoing CPD requirements for registrants; the regular auditing of registrants, and the processes for dealing with complaints in relation to registrants – i.e. individual counsellors who are listed on the register*) at its regular meetings RAP also keeps a watching brief on the capacity of ACC to maintain the register in a manner that ensures that the public is able to access it in a meaningful way (including ensuring that the IT infrastructure supporting the register - which is hosted on the ACC’s website where it is freely searchable by

¹ [Ethics, policies and governance - ACC UK \(acc-uk.org\)](https://www.acc-uk.org/about-acc/ethics-policies-and-governance/)

² <https://www.acc-uk.org/about-acc/ethics-policies-and-governance/rap-reports/>



acc

Association of
Christians in Counselling
and Linked Professions

members of the public - is fit-for-purpose). Furthermore, RAP also regularly interrogates whether there are any “existential” issues relating to ACC as an organisation in terms of its ongoing operation, such as ensuring that the number of accredited members (and other membership categories) is stable (or rising), as well as ensuring that there are adequate personnel in place to enable ACC as an organisation to adequately manage the process of maintaining an accredited register.

2. RAP meetings during current accreditation year

Frequency of RAP meetings and attendance by RAP voting and non-voting members

During the accreditation period 1 May 2023 to 30 April 2024, RAP held meetings on 19 May 2023, 22 September 2023, 8 December 2023 and 22 March 2024.³ Each of these meetings was of approximately 3 hours duration. All meetings, other than the meeting held on 22 March 2024 in Sutton, took place remotely via video conference.⁴ Each meeting was quorate.⁵ As well as attendance by a quorum of RAP voting members, the above meetings were also attended by one or more of Sue Monckton-Rickett (ACC Chair of Trustees), Kathy Spooner (ACC CEO), Gillian Stuart (ACC Head of Membership Services and Registrar) and Sarah Palmer (Deputy Registrar), each of whom is a non-voting member of RAP. In addition, in accordance with one of the outcomes of the PSA’s 2022 Governance Targeted Review (*see further below*) a representative of ACC’s Board was invited to attend each RAP meeting, as a “Board Observer”. Chris Williams attended the meeting on 22 September 2023, Christine Pinder attended the meeting on 8 December 2023 and Leroy Harley attended the meeting on 22 March 2024. There was no Board member available to attend the meeting on 19 May 2023.

Minutes of RAP meetings

The main work undertaken by RAP during the above period is referred to in the published minutes of the above meetings, which are available on the ACC website.⁶ Note that the published minutes have been redacted to ensure that confidential matters which were discussed at these meetings are not disclosed.

³ This accords with the requirements of the RAP’s TOR, which stipulates a minimum of three meetings to be held each year.

⁴ This method of convening meetings is permitted under the RAP’s TOR, once the Chair has given their permission.

⁵ Under the RAP’s TOR, a quorum is three voting members.

⁶ See <https://www.acc-uk.org/about-acc/ethics-policies-and-governance/rap-meeting-notes/>.



acc

Association of
Christians in Counselling
and Linked Professions

3. Updating of RAP Terms of Reference (and related governance documents)

One aspect of the RAP governance protocol is a requirement to review and update RAP policy documents⁷ on an annual basis to ensure that they are clear, consistent, and compliant with the PSA standards and guidance. The RAP policy documents reviewed and updated by RAP during the current accreditation year were as follows:

- RAP Terms of Reference
- RAP Recruitment Process
- RAP Membership Selection Criteria
- NEW: RAP Conflicts of Interest policy (*see further below*)
- Guidance on Redacting RAP and Board Minutes (*new document*)

The review and update process involved the following steps:

- The Chair of RAP, in consultation with ACC's CEO, reviewed and redrafted (*or in the case of new documents: drafted*) the revised policy documents, incorporating any changes they deemed necessary/appropriate, as well as any feedback or suggestions received from RAP members.
- Revised drafts of the policy documents were circulated to RAP members for their review and comments in advance of the September 2023 RAP meeting.
- The policy documents were discussed and agreed at the September 2023 RAP meeting, with some further amendments being made during the meeting to clarify wording and definitions.
- The policy documents were submitted to the ACC's Board for approval at the October 2023 board meeting and were agreed subject to minor changes.
- The policy documents were finalised and published on ACC's website in November 2023.

The main changes made to the policy documents this year were:

RAP Terms of Reference: The terms of reference were amended to reflect the wording of the PSA's revised accredited register standards; to align the period of service for RAP members with that for board members; to include a reference to the new conflict of interest policy and register; and to add a new task for RAP to consider the impact of relevant changes to the current regulatory system.

RAP Recruitment Process: The recruitment process was amended to replace the CEO with the Chair of RAP as the person responsible for overseeing the recruitment process; to clarify the role of the ACC Board in approving the appointment of RAP members, and to include a reference to the new conflict of interest policy and register.

⁷ [RAP policies and guidelines - ACC UK \(acc-uk.org\)](https://acc-uk.org)



acc

Association of
Christians in Counselling
and Linked Professions

RAP Membership Selection Criteria: The selection criteria were amended to include a requirement for any prospective RAP member to be a person of good standing, with no unspent convictions or sanctions by other professional bodies, and to exclude individuals on complaints panels and assessors from being RAP members, to avoid potential conflicts of interest.

Guidance on Redacting RAP and Board Minutes: This new guidance was developed to provide a consistent and transparent approach to redacting RAP and Board minutes before publishing them on ACC's website, to ensure that confidential matters are not disclosed, and to comply with data protection legislation and information security requirements.

4. (New) Conflicts of Interest policy

As part of the RAP governance review process (*see paragraph (3) above*), ACC has developed a new conflict of interest policy and register for RAP members (*as well as a parallel policy and register for Board members and staff*). The policy and register aim to ensure that any actual, potential or perceived conflicts of interest that may arise in relation to RAP's role and responsibilities are identified, declared and managed appropriately, in line with the PSA's standards and guidance.

The policy and register were drafted by ACC's CEO and Head of Membership Services, and reviewed and approved by RAP and the Board in September 2023. The policy defines a conflict of interest as "*a situation where a person's personal interests or loyalties could, or could be seen to, prevent them from making a decision only in the best interests of ACC*". The policy also covers conflicts of loyalty, which are "*situations where a person's loyalty or duty to another person or organisation could influence, or could be seen to influence, their decision making in relation to ACC*". The policy sets out the principles and procedures for identifying, declaring, recording and managing conflicts of interest and loyalty, and the roles and responsibilities of RAP members in relation to this.

The register is in the form of a spreadsheet which records the details of any conflicts of interest or loyalty declared by RAP members, either on an annual basis or as they arise. The register also records actions taken to manage or resolve conflicts, and the dates of review and update. The register is maintained by ACC's Head of Membership Services, and is accessible to RAP members via a shared folder. The register is also reviewed by the Board on a regular basis.

All RAP members completed and submitted a declaration of interests form in December 2023. The form requires RAP members to disclose any personal or professional interests or loyalties that could conflict or interfere with their role and duties as RAP members, such as:

- Any paid or unpaid positions, affiliations or memberships with other organisations or groups that are relevant to ACC's work or sector, or that may influence or be influenced by ACC's decisions or activities;
- Any financial or non-financial benefits or interests that may be gained or lost as a result of ACC's decisions or activities, or that may create an incentive or pressure to act in a certain way;



- Any personal or professional relationships or connections with ACC staff, Board members, registrants, complainants or other stakeholders that may affect or be affected by ACC's decisions or activities, or that may create a bias or favouritism; and
- Any other circumstances or situations that may create a conflict of interest or loyalty, or that may raise a question or concern about the RAP member's ability to act impartially and objectively in relation to ACC's work.

Going forward, RAP members are required to complete a Declaration of Interests form on an annual basis, and are also required to declare any conflicts of interest or loyalty relevant to the agenda of each RAP meeting at the start of each meeting, and to abstain from any discussion or decision where a conflict exists or may arise. Any conflicts declared at meetings are recorded in the minutes and added to the register. As an example, if a member of RAP were to be invited to present training at an ACC event, this would need to be raised at a RAP meeting before the event took place. If no meeting was scheduled, then RAP members could be contacted by e-mail instead, to enable them to approve or to query any proposed payment in advance of the event taking place.

It was also agreed that any payments made by ACC to RAP members should be included in the RAP Chair's annual report to the PSA.

I can confirm that no payments were made by ACC to any RAP members during the current accreditation year. However, a food hamper, valued at approximately £50 was gifted by ACC to RAP member Dr. Heather Churchill, as a thank-you gift for a training session which she delivered to ACC members at ACC's 2023 Annual Conference on 21ST October 2023 entitled "Value Conflicts".⁸

5. PSA standards and guidance

A consideration of the PSA standards⁹ and guidance, including updates on any changes in these standards/guidance, is a standing item on the agenda for all RAP meetings. This is to reflect the outcome of the targeted review undertaken by the PSA on ACC in 2022, which resulted in a condition being imposed on ACC requiring it to demonstrate how it ensures that the standards for accredited registers are considered in-depth whenever any policy or other relevant change is proposed which impacts on the register.

⁸ Note that, at the RAP meeting on 8th December 2023, Dr. Heather Churchill (HC) made a declaration that ACC had sent her a food hamper as she had undertaken some lecturing on-line for ACC members for which she had not charged a fee. HC stated that she had also registered this on the conflict-of-interest register.

⁹ See <https://www.professionalstandards.org.uk/what-we-do/accredited-registers/about-accredited-registers/our-standards>.



acc

Association of
Christians in Counselling
and Linked Professions

Equality, Diversity and Inclusion (EDI) standard – PSA Standard 9

The main development in this area during the current accreditation year was the introduction of a new Equality, Diversity and Inclusion (EDI) standard by the PSA, which was formally launched on 6 June 2023.¹⁰ The new standard requires accredited registers to demonstrate how they promote and support EDI within their organisation, their profession and their service users. The standard has four criteria, which are:

- The organisation has a clear commitment to EDI and this is reflected in its governance, leadership and culture.
- The organisation collects, monitors and evaluates EDI data and information relating to its registrants, staff and service users, and uses this to inform its policies and practices.
- The organisation provides guidance, training, and support to its registrants and staff on EDI issues and expectations, and addresses any concerns or breaches effectively.
- The organisation engages with and responds to the diverse needs and expectations of its service users and other stakeholders, and seeks to improve access, quality and outcomes of services.

The ACC was required to submit to the PSA a self-assessment against the new standard by October 2023, and has until the next review cycle to meet the standard fully, where possible. RAP has been involved in discussing and advising on ACC's progress and plans in relation to the new standard, including issues and challenges in relation to:

- The lack of a common data set or definition for EDI across the different accredited registers, which makes it difficult to compare and benchmark performance and to identify good practice.
- The difficulty of collecting EDI data from service users, as ACC does not have direct access to client information or feedback and relies on registrants to obtain consent and provide anonymised data.
- The need to contextualise and interpret any EDI data collected, especially for a smaller organisation such as ACC with a relatively low number of registrants and complaints, so as to ensure that the data is not used to discriminate or disadvantage any groups or individuals.

¹⁰ See <https://www.professionalstandards.org.uk/about-us/equality-and-diversity>.



acc

Association of
Christians in Counselling
and Linked Professions

- The need to align ACC's EDI strategy and guidance with the SCoPEd framework (*see further at paragraph (9) below*) and with the other SCoPEd partners, as well as with the PSA's expectations and standards.

Now that ACC's new IT system is in operation (*see paragraph (11) below*), it is hoped that ACC will be better able to collect EDI information about its registrants, establish a baseline and then monitor looked-for changes against its EDI strategy (once this has been formulated and agreed) The ACC is aware that a particular area of interest for the PSA relates to the monitoring of complaints from an EDI perspective.

RAP will continue to monitor and support ACC's work on EDI and provide feedback and recommendations, as appropriate.

PSA Standard 1B: benefit to the public¹¹

Another area relating to PSA standards and guidance in which RAP has been involved is the assessment of ACC against Standard 1B, which relates to whether the holding by ACC of an accredited register benefits members of the public, and whether the benefits outweigh the risks.

ACC submitted its response to this assessment request to the PSA in June 2023, providing evidence of the benefits of counselling in general, and of faith-based counselling in particular, as well as setting out the risks and mitigations associated with ACC's register. ACC received feedback from the PSA in December 2023, confirming that Standard 1B had been met. The PSA also issued two recommendations, which were:

- Recommendation 1: that ACC should update its risk matrix to include the risk of spiritual abuse, and that the mitigations for this risk should include reference to the ACC's Safeguarding Policy.
- Recommendation 2: that ACC should consider supplementing its guidance for registrants with advice on working with people from other, or no, faiths.

ACC subsequently met with the representatives of the PSA to discuss these recommendations and put forward a suggestion that recommendation 1 should apply to **all** counselling and psychotherapy registers, not just to ACC. In relation to recommendation 2, ACC highlighted that the Churchill Framework¹² had been written in a way that could be applied to all faiths.

ACC has accepted and has fully implemented both recommendations.

¹¹ See https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-supplementary-guidance-for-standard-one.pdf?sfvrsn=3e5f4920_6.

¹² See <https://www.acc-uk.org/wp-content/uploads/2023/04/The-Churchill-Framework.pdf>.



acc

Association of
Christians in Counselling
and Linked Professions

Other PSA-related developments

RAP has also been informed of, and consulted, on other changes to the PSA's regulatory system, such as the introduction of a new "complaints and concerns" policy by the PSA, which sets out how the PSA will handle complaints and concerns about accredited registers, and the development of a new digital platform by the PSA, which aims to improve the accessibility and functionality of the PSA's website and online services.

6. PSA targeted review

When undertaking its 2023 Annual Check on ACC, the PSA was advised that a complaint had been made by an individual who was then the subject of a disciplinary review (*and who has subsequently been removed from the ACC's register following a fitness-to-practise investigation*) to the Information Commissioner's Office (ICO) in relation to three alleged data security breaches. Consequently, the PSA determined the need to carry out a targeted review focused on Standard Six (Governance) in the context of the ICO investigation.

The PSA's Accreditation Panel carried out the targeted review and concluded that Standard Six was being met.¹³ It issued the following single recommendation:

Recommendation One: The ACC should monitor and evaluate the implementation and integration of the new processes they have introduced to meet the requirements of the Information Commissioner's Office (ICO) in relation to information security.

7. Redrafting ACC's Complaints Policy

One particular area of focus for RAP during the current accreditation year has been to provide input to the proposed new complaints policy for registered members of the ACC. This was in response to a targeted review by the PSA which had identified some gaps and weaknesses in the previous policy.¹⁴

RAP members discussed the proposed design of the policy with ACC's CEO, Chair of Trustees and Chair of Membership Services at several RAP meetings during the current year, with the aim of making the policy more clear, fair and proportionate. RAP suggested some changes to the draft policy, such as renaming the "Notifications Panel" as the "Interim Suspension from Practice Panel" to make its purpose abundantly clear, and the inclusion of a mediation process before any formal complaint. In addition, the legal representatives on RAP recommended that ACC arrange for the revised complaints policy to be reviewed by an external legal advisor, prior to being submitted to the PSA.

¹³ See [acc-targeted-review-panel-report.pdf \(professionalstandards.org.uk\)](#).

¹⁴ See my 2022-2023 Annual Report to the PSA: [Association-of-Christian-Counsellors-RAP-report-2022-2023-FINAL.pdf \(acc-uk.org\)](#) for further details.



acc

Association of
Christians in Counselling
and Linked Professions

The ACC is currently making further changes to the draft policy, in part to take into account learnings acquired at the PSA's research seminar on complaints (and how to write good practice guidelines for complaints) which took place on Wednesday 28th February 2023. One particular area of ACC's draft policy potentially requiring additional work following this seminar relates to the experiences of witnesses in fitness-to-practise cases, which can often be a stressful one: as part of this process, organisations need to demonstrate care as well as competence. Other aspects of the policy currently under further consideration relate to the balance between formal and informal processes, and public law principles (i.e. doing the minimum to restrict an individual's freedom). The PSA has also identified the Human Givens Institute (HGI) complaints policy as one meriting consideration, in that it favours a conciliatory process. Due to other important tasks such as implementing the new website and application system, ACC hope to pick up work to finalise the policy in July 2024.

8. Review of live complaints

Another regular activity of the RAP has been to review live complaints on a confidential basis and to ratify the decisions and outcomes of ACC disciplinary panels. On account of time constraints, this ratification process generally takes place by e-mail, rather than at RAP meetings, to avoid any delays in the process.

RAP has also provided feedback and support to ACC's CEO, Chair of Trustees and Chair of Membership Services on the handling of one particularly complex and challenging case, involving the harassment of ACC staff by a (now former) registrant.

In undertakings its review and ratification role, RAP has also noted the impact of the complaints process on the wellbeing of both registrants and complainants, and the need for care and competence in dealing with them.

9. Notification of Change: Accreditation and Equivalence of Qualifications (SCoPEd Framework)

(Note: 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 framework aims to standardise qualifications and competencies across the profession, ensuring a high level of practice and public trust. Following the publication of the January 2022 version of the SCoPEd Framework¹⁵, which marked the delivery of phase one work on SCoPEd, the project moved to phase two, which included the creation of a shared set of principles – based around fairness, inclusion and transparency – and which was intended to guide the implementation of the framework and facilitate the delineation of entry points and competency tiers. In doing so, a collaborative approach has been emphasised in terms of finding common ground while preserving the unique identities of each body.)

¹⁵ See <https://www.bacp.co.uk/about-us/advancing-the-profession/scoped/scoped-framework/>.



As part of phase two of the project, on 24th March 2023 and in accordance with the PSA's Notification of Change Guide,¹⁶ the ACC submitted a Notification of Change to the PSA to explicitly align its qualification entry points with the equivalent qualification entry points set out in columns B and C of the SCoPEd Framework.

The PSA responded to this Notification of Change with a list of questions addressed to the ACC in relation to the proposed change. However, some of these questions applied to all the members of the SCoPEd partnership, not just to ACC. As a result, a meeting was convened between the PSA and all the SCoPEd partners, in order to discuss the extent to which the change impacted on the PSA's standards.¹⁷ Although the meeting acknowledged that the framework's introduction represented a significant change, the impact of the change on existing standards is still under debate. It was agreed that the PSA would write to the SCoPEd partnership confirming that each organisation would only be required to answer questions relevant to its particular register.

Because of these unforeseen delays to the notification of change process, ACC was not able to introduce the new SCoPEd-aligned accreditation process within previously announced timeframes. In order not to disadvantage members, the deadline for submissions under the "old system" was extended to 31 March 2024. Additionally, a beta version of the new accreditation process has been, accompanied by a member forum to guide applicants through the new procedure. It is understood that minor adjustments may be made to the beta version following the completion of the notification of change process.

The ACC and its SCoPEd partners are committed to the successful implementation of the SCoPEd framework. However, the process has been complicated by the collective nature of the partnership's response to the Notification of Change. The ACC continues to work towards a resolution that maintains the integrity of the framework and the trust of its members and the public.

10. Membership statistics, audits, etc.

At each quarterly meeting, RAP has monitored the membership register (including the numbers and categories of registered members), applications and appeals for membership as well as the practice reviews (audits) being undertaken on current members.¹⁸ RAP has noted a slight increase in registered members over the course of the year from 899 on 1.1.2023 to 951 on 1.1.2024.

¹⁶ See https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/guidance-documents/notification-of-change-process-guide.pdf?sfvrsn=33d37520_9.

¹⁷ See <https://www.professionalstandards.org.uk/publications/detail/accredited-registers---our-standards>.

¹⁸ In relation to the quarterly reports on membership statistics, as requested by RAP, these now include rolling reports on membership numbers, in addition to a "snapshot" of current numbers, with the reports broken down by membership category, as well as details of register applicants whose membership applications have not been approved, and the reason why.



acc

Association of
Christians in Counselling
and Linked Professions

At its regular meetings during the year RAP also discussed various policies and processes relating to the membership register, such as the notifications policy for applicants with criminal convictions or other risks [now called Safeguarding and Restoration Policy]; the register appeal policy for rejected applicants; the return to practice policy for applicants with a gap in practice (*a policy which had been suggested by RAP*) and the equivalence policy for applicants with different qualifications. RAP also reviewed the amended practice review (i.e. audit) process and was provided with feedback from members who had undergone it. RAP noted the benefits of the practice review in ensuring safe and ethical practice, and the challenges for ACC in meeting the audit target of 5% of registered members. RAP also approved the proposal to change the supervision guidelines to require a UK-based supervisor for registrants, on the grounds that this would assist in maintaining the integrity of the accredited register.

11. Organisational issues (including new IT system/website)

At its regular meetings, RAP also received updates on various organisational issues relating to ACC, such as IT issues and staff changes.

Given its vital importance to the ongoing hosting of its Accredited Register, progress reports on the development and implementation of ACC's new website (*which includes a portal for access to ACC's Accredited Register*) was a standing item at all RAP meetings during the current accreditation year. At the December 2023 RAP meeting, the members of RAP were given a demonstration of the new IT system and gave positive feedback on its features and functions. The new website went live on 20th March 2024 without any major glitches and is proving to be a significant improvement to the old IT system, which has suffered occasional system outages.

RAP also noted the appointment of Gillian Stuart as the new Registrar/Head of Membership Services and Sarah Palmer as the new Deputy Registrar, during the course of the current accreditation year.

12. ACC Risk Register

During the course of the accreditation year, RAP also undertook occasional reviews of the ACC risk register, which identifies and assesses potential risks to ACC and to the register, as well as the mitigating actions and controls which have been put in place for each such risk. RAP discussed some of these risks (including their potential impact and likelihood) such as an IT systems failure, membership retention rates and conversion therapy legislation. RAP also suggested some potential additional risks and actions, such as in relation to the diversity and inclusion of ACC members and staff, and the governance and accountability of ACC.

13. External projects and partnerships

In relation to external projects and partnerships, during the course of the current accreditation year RAP also discussed a number of external issues affecting ACC and the counselling profession



acc

Association of
Christians in Counselling
and Linked Professions

more generally, such as the SCoPEd framework (*see item (9) above*), the NICE guidelines on suicide and self-harm and the proposed legislation on conversion therapy. RAP recognises the importance of ACC's involvement and influence in these matters, and the need for clear and consistent communication with members and with the public.

14. RAP succession planning

Duration of appointment to membership of RAP

I have been a member of RAP since 1 June 2017, when I was appointed to the role of Chair. I am a solicitor (qualified in England & Wales). 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 period, 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 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.

Current (and future) membership of RAP

The current membership of RAP with voting rights are: Dr. Heather Churchill (HC), Doreen Rowland OBE (DR); Fiona Stevenson (FS), Tim Warren (*who is a retired solicitor, and who joined RAP in late 2022, initially for a 3-year term*) 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.

In March 2024, Richard Needle, who had been a member since mid-2018, and who had agreed in 2021 to serve a further three-year term, asked to step down from RAP. This resignation was accepted, and minuted at the March 2024 RAP meeting.

FS became a member in September 2020, and agreed to serve a second three-year term when her first term expired in September 2023.

Given that three of the five current voting members of RAP (including its Chair) are required to step down in just over two years' time, and also taking into account the fact that it would be highly undesirable for 60 per cent of the voting members of RAP to retire at the same time, it is essential that, during the course of the next accreditation year, serious thought is given to the process of succession planning for RAP. This issue has been raised with ACC's CEO and Chair of Trustees as one requiring their particular attention.



acc

Association of
Christians in Counselling
and Linked Professions

In terms of potential new recruits to RAP, 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 I understand that these efforts have, so far, proved unsuccessful. In addition, I understand that, despite invitations to join RAP having been advertised prominently in the Spring 2024 issue of ACCORD, ACC's quarterly newsletter, no expressions of interest have thus far been forthcoming.

It has also been suggested that ACC should consider contacting recruitment organisations specialising in non-executive directorships, as this could open up access to a pool of talent in terms of individuals 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 that advertising in the charity sector, and through the National Council for Voluntary Organisations, might be a good source for new recruits. However, there was recognition of the fact that, because the role is an unpaid one, this may be having a negative impact on recruitment.

In terms of the professional background of new members, it was also suggested that it would be helpful to have at least one more counsellor on the Panel.



acc

Association of
**Christians in Counselling
and Linked Professions**

Conclusion

In my last annual report to the Professional Standards Authority, dated 10 May 2023, I stated that the focus for RAP for the accreditation period 2023-2024 was as follows:

- To undertake its responsibilities as set out in its Terms of Reference;
- 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:

- to undertake its responsibilities as set out in its Terms of Reference;
- to monitor ACC's implementation of matters recommended by RAP;
- to 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;

In addition, I will be actively liaising with ACC in relation to succession planning for RAP, not only in relation to a replacement for my role as Chair of RAP, but also to investigate suitable replacements for a number of other current members of RAP, to reflect the fact that three RAP members (including me) are required by the RAP's TOR to step down by mid-2026 at the latest, and also given the need to avoid a "cliff-edge" whereby a large proportion of RAP members all stand down at once.

Catherine Clarke

Catherine Clarke, Chair of the ACC's Register Advisory Panel

18 May 2024