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United Kingdom Council for Psychotherapy (UKCP)

# Handling complaints about therapists

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Report of the UKCP Professional Conduct Committee  
1 January – 31 December 2025



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# Foreword

I'm delighted to present the 2025 Professional Conduct Committee (PCC) report. I hope you find this report informative. Its purposes are to give UKCP members and the public a view into the work of the committee, and to allow us to learn what triggered complaints in the past year to hopefully avoid them in the future.

In 2025, we welcomed new members to the committee: Jo Burns, Carl Flynn, Louise Elwell and Mary Rooke. I want to thank all PCC members for bringing their valuable experience to promote confidence in psychotherapy and in the UKCP Complaints and Conduct Process (CCP).

A special thank you to those who left the committee in 2025: lay member Graham Briscoe and UKCP professional standards manager Alice Love. Both contributed hugely to the effective running of the PCC and the handling of complaints. My thanks to the UK Council for Psychotherapy (UKCP) complaints and conduct team, who have been extremely busy: professional standards managers Nabil Mekkaoui and Kat Zhou, and complaints and conduct manager Sunita Thakore, who represented us in High Court proceedings when adjudication panels' decisions were challenged. Our committee couldn't operate without UKCP case administrator and panel secretary Bethany Rees, whose organisational and IT skills are second to none.

2024 saw a sharp decrease in the number of complaints received while referrals to adjudication panels increased. Complaints in 2025 increased to 106, which is our normal expected level, with increased allegations of inappropriate sexual behaviour and other breaches of professional boundaries. The committee handled these serious complaints with appropriate rigour and care. I am confident that the UKCP complaints procedure is fit for purpose and operating well.

We will consult this year, as will other regulators, on introducing consensual disposals of complaints. This consultation has been delayed while we await guidance from the Professional Standards Authority (PSA). We look forward to exploring how consensual disposals can speed up the time it takes to dispose of complaints, which is of immense benefit to the complainant and registrant.



**Brian Linfield MBE**  
Chair, UKCP Professional Conduct Committee

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# Introduction

Each complaint is unique, shaped by the distinct nature of the therapeutic relationship. By recognising and recording each complaint, the PCC's annual report aims to highlight complaint trends year on year and draw out opportunities for learning. While complaints can be difficult for all involved, when handled well, they offer valuable opportunities for both registrants and clients to reflect on what went wrong and to develop greater insight into psychotherapeutic practice. Analysing complaints and reviewing annual trends help identify areas where practice could be strengthened – whether through additional supervision, training, peer discussion or personal reflection.

In 2025, the complaints and conduct team received the highest ever number of complaints. We can attribute this increase in complaints to multiple factors, such as:

- greater public awareness of statutory regulation and the role of regulators
- improved accessibility of the complaints process through accrediting bodies
- a growing number of UKCP registrants in recent years.

The PCC's *Learning from complaints* event reached maximum capacity in 2025, with the highest number of attendees to date. This demonstrates registrants' strong interest in understanding the reasons behind complaints and learning from the data we collect.

We look forward to our next *Learning from complaints* event in 2026, where we will continue to share our collaborative knowledge and expertise in handling complaints.



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# About UKCP

The UK Council for Psychotherapy (UKCP) is the leading professional body for psychotherapists and psychotherapeutic counsellors in the UK. Alongside offering professional support for our members, we regulate the profession, protect the public and promote access to psychotherapy for all.

Our membership includes over 12,000 individual members and more than 70 training and accrediting organisations.

Our register of over 9,000 registrants is accredited by the government's Professional Standards Authority for Health and Social Care. It includes the following healthcare professionals:

- psychotherapists
- psychotherapeutic counsellors
- psychotherapists and psychotherapeutic counsellors who work with children and young people, and with families.



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# The Professional Conduct Committee

The Professional Conduct Committee (PCC) is responsible for overseeing the successful functioning of UKCP's Complaints and Conduct Process (CCP). It plays a key part in enabling UKCP to meet its charitable and public protection objectives and maintain professional standards of excellence.

The PCC has oversight of each individual case that progresses through the complaints process. It provides advice and guidance to UKCP's complaints and conduct team, who manages complaints day-to-day.

Occasionally, the PCC may also be asked to make the decision about whether to take a case forward if the professional standards manager feels unable to do so.

Another key function of the PCC is to enable learning from complaints. The complaints and conduct team undertakes a root cause analysis at the conclusion of each case to determine the issues that are driving complaints and identify key areas of concern. The team uses this information to shape training events and help identify if further policies and guidance are needed.

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## PCC members

In 2025, the PCC members were:

### Lay chair

#### **Brian Linfield, MBE**

Brian sits as a specialist member of the Mental Health Tribunal in the Health, Education and Social Care Chamber and as a disability-qualified panel member in the Social Entitlement Chamber of Tribunals. He is a retired magistrate and retired civil servant. Brian has a 17-year background of statutory regulation within the water industry, for which he was honoured with an MBE. He was also a regional lay chair for complaints within the NHS.

### Deputy chair and professional member

#### **Karen Rowe**

Karen has worked as a psychotherapist for over 30 years in different contexts including the NHS, voluntary sector, HM Prison Service and private practice. She also undertakes supervision and consultancy for various organisations such as the NHS, forensic services and the media sector. She previously worked as an academic and senior manager in psychotherapy training organisations and continues to participate as a conference presenter and through publication. Karen is currently undertaking research into wrongdoing in organisations.

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## Professional members

### Carl Flynn

Carl is a UKCP-registered integrative psychotherapist and a British Association for Behavioural and Cognitive Psychotherapies-accredited high-intensity cognitive-behavioural psychotherapist working in private practice in the West Midlands. He is also a senior lecturer and programme leader at Birmingham Newman University.

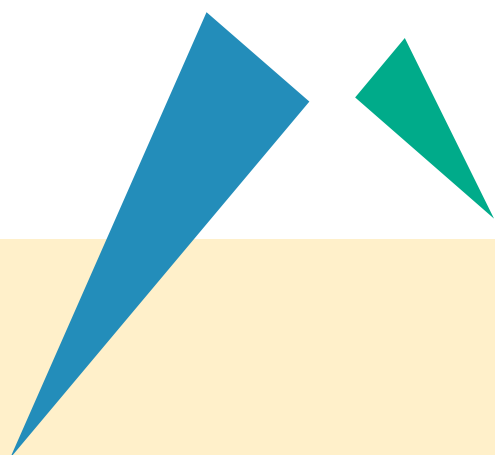
Prior to training as a therapist, Carl was a police officer for over 30 years, retiring at the rank of chief inspector. As a detective chief inspector, he also performed the role of senior investigating officer, overseeing the investigation of serious crimes such as homicide, rape and kidnap, as well as investigating serious complaints and allegations made against serving police officers and police staff. Carl is also a member of the UKCP Statutory Regulation Working Group.

### Christina Sensale

Before qualifying as a psychotherapist in 2008 at The Minster Centre, London, Christina worked as a human resources manager, consultant, workshop facilitator and coach within the retail, professional services and higher education sectors. She also completed a master's in organisational behaviour at Birkbeck College. She has taught on courses at several psychotherapy training organisations and now works as an integrative psychotherapist with adults in private practice and through several employee assistance programmes.

### Jo Burns

Jo has over 40 years' experience in mental health. She qualified as a nurse in 1986 and remained on the Nursing and Midwifery Council register for 30 years before retiring. She completed her training in psychotherapy in 2003 and has served as a specialist adviser to the Care Quality Commission and as a safeguarding lead for a psychological therapy service within the NHS. Jo continues to work as a psychotherapist and clinical supervisor.



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## Lay members

### **Emi Gutwenger**

Emi is a senior associate solicitor with Clifford Chance LLP and focuses on financial regulation. He has degrees in Austrian law and economics from Leopold-Franzens University in Innsbruck. He also has a graduate diploma in law from BPP Law School in London. Having previously worked as a judicial assistant in Austria and as a volunteer with various legal advice centres in London, he has considerable experience of judicial and quasi-judicial processes and complaints procedures.

### **Emma Moir**

Emma works as a senior civil servant and focuses on transformational change and delivery. She is a qualified solicitor (non-practising) and has had a successful career in the public sector, including the NHS, for over 30 years, holding a number of senior roles. Emma has considerable experience of judicial and quasi-judicial roles and sits on a tribunal, as well as professional conduct and advisory committees.

### **Graham Briscoe**

Graham is a chartered engineer, chartered IT professional, certified management consultant and a fellow of the Institute of Workplace and Facilities Management. Now retired, he has built up a portfolio of community investment 'governance support' roles, including university and further education college governance, supporting multi-academy trust boards and visiting fellowships at several universities.

Graham is also a board non-executive director with CXK (a young people's careers guidance company) in Kent and is an independent trustee of two university students' unions. He also provides pro-bono change and facilities management support to not-for-profit organisations in the south-west. He recently completed a nine-year term as a member of the governors' council of the University Hospitals Bristol and Weston NHS Foundation Trust.

### **Louise Elwell**

Louise works as a case examiner for Social Work England and has previously worked for both the General Pharmaceutical Council and the Health and Care Professions Council managing, supervising and conducting regulatory investigations. She has also managed high profile investigations of bullying, harassment and sexual misconduct in the workplace and criminal investigations as a police officer. Louise has previously volunteered and worked for Victim Support too.

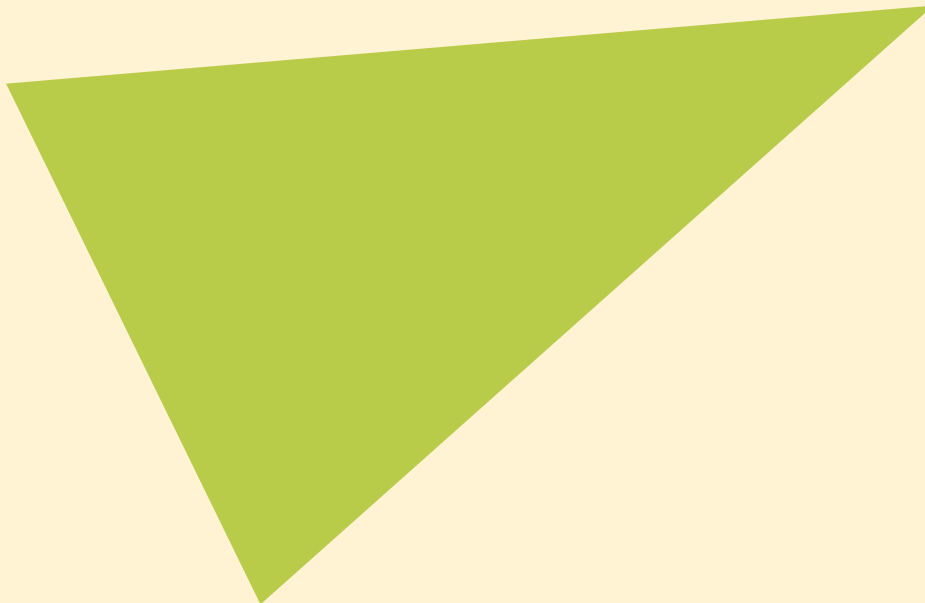
### **Mary Rooke**

Mary is a retired diagnostic radiographer/mammographer and senior academic. She holds professional qualifications, a postgraduate certificate of education and is a fellow of the Higher Education Academy. Mary has held senior roles in student practice education and governance in both an NHS Trust and a university faculty of health. She has considerable experience of quasi-judicial processes through chairing fitness for practice, disciplinary

and complaints panels. She also has expertise in ensuring organisational and individual compliance with professional, statutory and regulatory body requirements, standards and professional codes of conduct.

Recently, Mary completed a 10-year term as a lay quality assurance visitor for the Nursing and Midwifery Council, undertaking university course approval, monitoring visits and participating in several extraordinary reviews in response to regulatory or media triggers. Mary has been involved in community governance roles at school level and recently became vice chair of the Regional Governance Group for a large multi-academy trust.

During 2025, Graham's assignment in the PCC came to an end after nearly 10 valuable years of service. We'd like to thank Graham on behalf of UKCP and the PCC for his beneficial insight and time on the committee.



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# The complaints and conduct team

Closely working in collaboration with the PCC, UKCP's complaints and conduct team manages the complaints received in accordance with the Complaints and Conduct Process (CCP, 2022) from the receipt of a complaint until its resolution.

In 2025, the team was made up of five members of staff, including the complaints and conduct manager, three professional standards managers, and a case administrator and panel secretary. One professional standards manager left the team in July 2025, bringing it to four members. The entire team has extensive experience in handling complaints and regulation in various fields.

To contact the complaints and conduct team, please email [complaints@ukcp.org.uk](mailto:complaints@ukcp.org.uk).



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# The Complaints and Conduct Process

The Complaints and Conduct Process (CCP) aims to:

- provide an objective, streamlined and transparent way of dealing with concerns or complaints about UKCP registrants
- meet the Professional Standards Authority's accreditation requirements for voluntary registers.

When UKCP receives a complaint or allegation, it goes through the following process:

- A professional standards manager will consider the complaint and collate the necessary information from the complainant and the registrant.
- The professional standards manager will put the information before the PCC along with their recommendation on how to proceed with the complaint. The PCC offers advice to the professional standards manager, who then makes the final decision.
- After consulting with the PCC, if the professional standards manager decides to take a case forward, they will refer it to an adjudication panel hearing. The decision to refer a case to an adjudication panel is based on the realistic prospect test: is there a realistic prospect that UKCP will be able to establish before an adjudication panel that the registrant may not be suitable to be on UKCP's register without any restrictions or conditions of practice?
- Neither the professional standards manager nor the PCC make findings on the facts of the complaint. The adjudication panel makes findings of fact, and it alone decides if an allegation is found proven and if so, whether to impose any sanction.

If a case does not meet the realistic prospect test, but professional development and reflection may be beneficial, the PCC may give the registrant constructive feedback or recommendations.

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# Types of enquiries received

In addition to working alongside the PCC to implement the CCP, the complaints team respond to any enquiries received that fall into the below categories:

## General enquiries

These are enquiries from UKCP registrants, UKCP organisational members, members of the public and representatives from other professional organisations. For example, a registrant might contact the team for advice about disclosing client notes upon request or a member of the public might query whether a therapist is on our register.

## Complaint enquiries

These are enquiries from people who are considering making a complaint but would like further information on the CCP before doing so. Before making a formal complaint, most people get in touch with the team to seek advice or discuss their concerns. The team also receives enquiries from registrants who are concerned about receiving a complaint.

Enquiries can come via email or telephone. The team offers realistic expectations of the process, continuously informing people who enquire with us about what the CCP entails. The team will also explore all available channels the enquirer has taken so far. For example, they may ask if a registrant has spoken to their supervisor and/or indemnity insurance provider, or if a client has discussed their concerns directly with their therapist.

Information like this greatly helps the professional standards managers, as they need the full picture to support the people who contact us with concerns.

Of the 106 complaints UKCP received in 2025:

**55**

**were in scope.**

That is, they indicated a potential breach of the Code of Ethics and required further investigation.



**12**

**were about therapists who were not UKCP registrants or trainee members.**



**28**

**were outside the scope of the CCP.**

That is, they did not indicate a breach of the Code of Ethics or meet the criteria of the CCP, or the complainant did not provide enough information to assess the complaint.



**11**

**are on hold.**

That is, where the complaints and conduct team are waiting for more information from the complainant, the police, a court or another regulator or employer before determining whether the complaint is in scope.



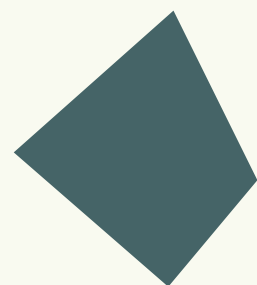
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## Complaints in 2025

We take complaints seriously and we are committed to safeguarding the public. However, it is important to remember that the vast majority of UKCP registrants practise every day and never receive a complaint.

In 2025, out of 106 complaints received, only 94 complaints were about UKCP registrants, meaning only 1 per cent of registrants had a formal complaint made against them.

	Jan-Mar	Apr-Jun	Jul-Sept	Oct-Dec	Total
General enquiries	43	29	27	25	124
Complaint enquiries	88	77	52	43	260
Complaints	24	22	34	26	106
Complaints referred to an adjudication panel hearing	3	0	1	2	6
Adjudication panel hearings	3	1	6	5	15
Preliminary hearings	1	0	0	1	2
Appeal panel hearings	0	1	0	0	1
Interim suspension order panel hearings	1	3	2	3	9



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## Terms explained

**General enquiries** – see page 11.

**Complaint enquiries** – see page 11.

**Complaints received** – written and signed complaint forms received by the complaints and conduct team.

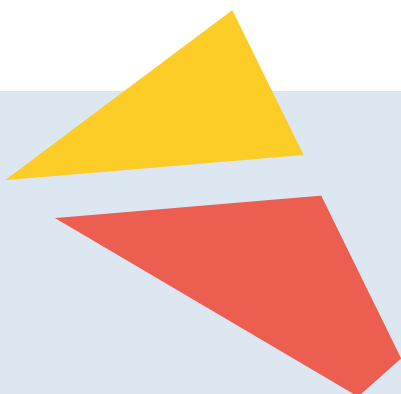
**Complaints referred to an adjudication panel hearing** – complaints that a professional standards manager has screened and found to be within scope of the CCP (that is, the complaint indicates a potential breach of the Code of Ethics), and where, having given the registrant an opportunity to respond to the complaint, a decision has been made to refer the matter to an adjudication panel. This decision is based on the realistic prospect test (see page 10).

**Adjudication panel hearings** – an adjudication panel comprises two registrant members (one is usually of the same modality as the registrant who is subject to the complaint) and a lay chair. An independent legal assessor and a panel secretary assist the panel. For an outline of the process, see page 15.

**Preliminary hearings** – where an adjudication panel meets before the full hearing to hear and determine preliminary applications the parties have made.

**Appeal panel hearings** – hearings that are convened if permission to appeal an adjudication panel's decision has been granted (at the formal request of the registrant or UKCP). An appeal panel will consider whether the determination made by an adjudication panel was correct. The appeal panel consists of two professional members and a lay chair. An independent legal assessor and a panel secretary assist the appeal panel.

**Interim suspension order panel hearings** – hearings that are convened if the content of a complaint suggests that an interim suspension order (to temporarily stop the registrant from practising) is necessary for public protection; in the interests of the registrant; and/or in the public interest. This can happen at any time during the complaints process.



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## Adjudication panel process

An adjudication panel follows a four-step process to determine:

1. whether the allegations are found proven
2. whether the allegations constitute misconduct
3. whether the registrant's current ability to practise is impaired
4. what sanction, if any, needs to be applied to remedy the registrant's practice, identify any training needs and protect the public.

An adjudication panel hearing has several possible outcomes:

### **Allegations not found proven**

Where the adjudication panel finds that the complained-of behaviour did not occur and therefore there has been no breach of UKCP's Code of Ethics.

### **Allegations found proven, but no misconduct found**

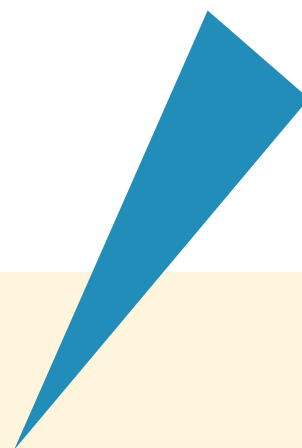
where the adjudication panel finds that the alleged behaviour did occur, but that the behaviour does not constitute misconduct.

### **Allegations found proven, and misconduct found, but no impairment found**

Where the adjudication panel finds that the alleged behaviour occurred and constitutes misconduct, but that the registrant's ability to practise unrestricted is not currently impaired.

### **Allegations found proven, misconduct and impairment found**

Where the adjudication panel finds that the alleged behaviour occurred, that it constitutes misconduct, and that the registrant's ability to practise unrestricted is impaired. The panel can only consider imposing a sanction if they find the registrant's fitness to practise is currently impaired.



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# Adjudication panel hearings in 2025



There were **15** adjudication panel hearings in 2025, concerning **seven** cases. On **five** different cases, an adjudication panel convened and considered the case at more than one sitting. All hearings took place online.

In total, **six** complaints were referred to an adjudication panel in 2025. **Four** referred cases are still ongoing at the time of this report's publication, with a view to concluding the matters in 2026.

In **six** cases that concluded in 2025, the adjudication panel determined that the appropriate sanction for the registrant was removal from the UKCP register (the most serious sanction a panel can impose). Termination of registration is a sanction of last resort for serious, deliberate and/or reckless acts involving abuse of trust (breach of boundaries and/or sexual misconduct), dishonesty, or persistent and irreparable failure.

In total, we received **five** applications to appeal. On **two** occasions, an independent lay appeal chair determined that these applications to appeal were not granted. Therefore, no appeal panel was convened. On **three** occasions, the application to appeal was granted. **One** appeal concluded while **two** appeals are ongoing at the time of this report's publication.

In addition to adjudication, interim order, and appeal panels, in 2025, **one** sanction hearing convened where the focus of the hearing was to assess if the appropriate sanction was determined by the previous adjudication panel in line with the Indicative Sanctions Guidance. In 2024, there were no sanction hearings.

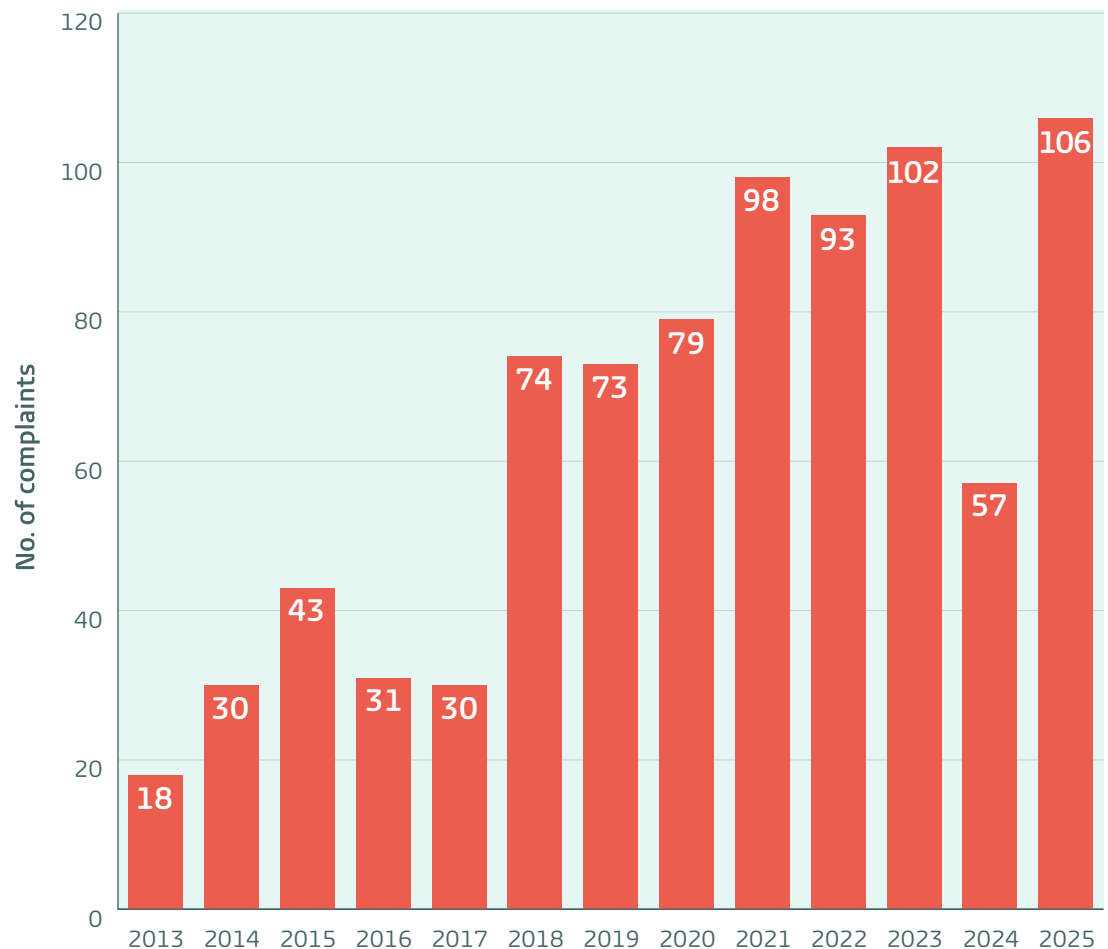
In 2025, we conducted the root cause analysis of **35** complaints. There can be multiple root causes for each complaint. For example, complaints could exhibit a breach of professional boundaries and unprofessional communication.

The top root causes of complaints in 2025 were:

- unprofessional communication and/or breakdown in communication
- failure to maintain professional boundaries
- poor management in the ending of therapy.

## Year-on-year analysis

UKCP has been collecting complaints data since 2013.



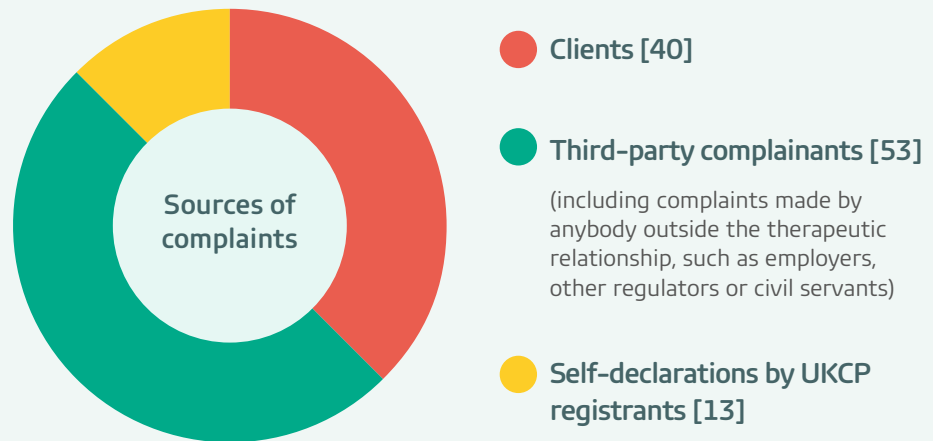
In contrast to 2024, where the complaints received drastically decreased, 2025 saw the largest number of complaints since we began gathering data. This may be due to larger discussion about statutory regulation and the role of regulators such as UKCP. This, as a result, raises public awareness of UKCP's policies and procedures to deal with complaints while reassuring the public on the complaints process.

In total, we received **five** applications to appeal. An independent lay appeal chair refused permission to **two** of these applications. Permission to appeal was granted for the **three** remaining applications, with **one** appeal hearing convened and concluded. The appeal panel concluded that the adjudication panel's decision on sanction was lenient and terminated the registrant's membership. The other **two** appeals are ongoing at the time of this report's publication.

Each annual *Learning from complaints* event aims to enhance members' understanding of the complaints process and help them adapt their practice to prevent complaints, ensuring public protection and safety.

## Who made formal complaints in 2025?

In total, UKCP received 106 complaints about UKCP registrants. The sources of complaints were:



As part of the annual UKCP membership renewal process, registrants must declare if they have been subject to any criminal conviction, complaint or disciplinary action. Registrants can declare a complaint at any time during the year. It is the registrant's duty and responsibility to inform UKCP of any complaint, suspension, criminal conviction and/or disciplinary action as soon as possible.

In 2025, **92** registrants declared complaints, police action or disciplinary action against them. Upon review, **13** declarations indicated a potential breach of the Code of Ethics and progressed to further action under the PCC. The remainder did not indicate a potential breach of the Code of Ethics and were resolved with no further action.

The annual declaration is now a solidified part of the membership renewal process. We believe registrants are aware of this duty, which is why the number of self-declarations increased in 2025 compared to 2024. We will continue to highlight this process into 2026 as we receive complaints and self-declarations.

Through our *Learning from complaints* event, we aim to transform the perception of complaints as negative. Instead, we want to showcase how complaints are avenues to learning and development within a registrant's practice. By understanding the context of the complaint and analysing the data, we aim to ensure safe and sensible practice which protects the public and our registrants.



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## Root causes of complaints

All complaints received across the year are brought to the PCC for evaluation. Once the PCC has referred or closed the complaint, the panel secretary reports on the root causes of the complaint which fall in scope, aiming to identify the behaviours or situations that triggered the complaint.

The methodology is simple. For each complaint, the team reviews the information and categorise the complaint into one or more broadly defined groups.

This provides a broad oversight of the issues driving complaints and throws up a red flag when certain issues recur. Once we have this information, we can begin to analyse and understand the circumstances that are causing the complaints within each category. We share this information through the *Learning from complaints* section on our website. We also had a section on root cause analysis in the 2025 *Learning from complaints* event.



We conducted a root cause analysis of **35** cases in 2025. The causes of the complaints were:

Cause	No. of cases
Unprofessional communication and/or breakdown in communication	16
Failure to maintain professional boundaries	12
Poor management of ending of therapy	5
Failure to act within limits of competency	5
Breach of client confidentiality	4
Sexual misconduct	4
Decision of another regulatory body	4
Breakdown of the therapeutic relationship	3
Bringing the profession into disrepute	2
Inappropriate use of social media	1
Adverse health	1

A few of the cases were categorised into more than one root cause. This happens when the cause of a case is the decision of another body, or if a case exhibits multiple factors of misconduct. Under the CCP, UKCP may consider any adverse findings made by other bodies, including the NHS or other regulators. These adverse decisions can relate to a range of situations, such as failing to maintain professional boundaries or breaching client confidentiality.

In comparison to 2024, cases with sexual misconduct as their root cause dropped from five to **four**. The top two root causes remain 'unprofessional communication and/or breakdown in communication' (**16**) and 'failure to maintain professional boundaries' (**12**) in 2025. This is similar to 2024 when there were **17** 'unprofessional communication' complaints and **11** 'failure to maintain boundaries' complaints. This continued trend could indicate the need for further development or training in these areas.



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## Learning from complaints event 2025

The annual *Learning from complaints* event remains popular, and UKCP intends to continue it into 2026 and beyond, treating complaints as learning opportunities for both registrants and the UKCP team.

On 16 May, the PCC and complaints and conduct team held their 2025 *Learning from complaints* event. The event offered registrants the opportunity to gain a comprehensive insight into the work of the committee while providing guidance on case law and topical issues, showcasing the need for regulation and ethical practice. By highlighting these issues and the causes of complaints, registrants may find ways to avoid circumstances in which trigger points arise. The event also encouraged registrants to reflect on their own practice and, for those who supervise others, to share insights with trainees and colleagues.

In 2025, **250** registrants signed up for the event – its maximum capacity – and **213** attended. The event opened with an overview of the PCC's 2024 annual report from chair Brian Linfield MBE. Brian also briefly discussed statutory regulation. Sunita Thakore, complaints and conduct team manager, then discussed bringing the profession into disrepute, referring to the Code of Ethics and Professional Practice (2019). She encouraged registrants to be mindful of their conduct outside the professional space.

Three interactive case studies, inspired by real complaints, explored clear breaches of sexual boundaries and professional misconduct. The team invited attendees to analyse the scenarios and identify which boundaries had been breached.

Panel secretary Bethany Rees then presented a root cause analysis of complaint data, highlighting recurring trends and detailing how complaints are categorised. The final presentation, delivered by professional standards managers Nabil Mekkaoui and Kat Zhou, used hypothetical role-play scenarios to explore two common complaint triggers: maintaining professional boundaries and managing therapy ending. Attendees participated through questions and discussions throughout.

Following the event, we sent a feedback survey. For **21 per cent** of the **213** attendees, it was their first time attending a UKCP event. Overall, the feedback was extremely positive, with many expressing their intention to attend the next event. Here is what our registrants liked most about the event:



*I thought this was an excellent webinar which not only covered the complaints process in general but provided solid detail on complaints received and subsequent outcomes. It was clear that each speaker had in-depth knowledge which they were able to share in a detailed but accessible way. I thought they struck the right balance of warmth and professionalism that is required for this work and I found the webinar both containing and reassuring – that as UKCP members we have robust policies and procedures in place that I can rely on; to be supported myself if the situation was to arise, but also to maintain standards across the membership."*



*Very clear examples to illustrate boundaries."*



*It was extremely well organised and prepped – very professional."*



*Speakers were clear about what they do and how they approach a complaint."*



*The varied way in which info was presented. It was so relevant and beneficial for me to be aware of both for my own clients and as a supervisor."*



*For a webinar it was inclusive, interesting and engaging, through the use of case studies and the chatbox."*



*Basing the content on real life, not fictional possibilities, was a salutary reminder of professional and client vulnerability in such circumstances."*

If you have any questions about the event, please contact [complaints@ukcp.org.uk](mailto:complaints@ukcp.org.uk).

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## Sharing good practice

We are keen to promote good practice and the work of our registrants.

If you have an example of good practice relating to the way you carry out your work as a practitioner and would like to share it with others, we would be pleased to hear from you.

To get in touch, email the complaints and conduct team at [complaints@ukcp.org.uk](mailto:complaints@ukcp.org.uk) – we welcome your input and your help in sharing effective ways of working.





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