



# Handling complaints about therapists

Report of the UKCP Professional Conduct Committee

1 January – 31 December 2024

# Complaints in 2024



**57**

complaints were received, of which **48** were about UKCP registrants



**0.62%**

of UKCP registrants were the subject of a complaint



**9**

complaints were serious enough to be referred to an adjudication panel. These related to **8 registrants**

(1 registrant had 2 complaints referred)

The complaints and conduct team handled:



**239**

general enquiries

**368**

complaints enquiries

UKCP convened:



**8**

interim suspension order panels, concerning **8 cases**



**3**

preliminary hearings, concerning **2 cases**



**8**

adjudication panels concerning **5 cases**



**1**

appeal panel hearing



**4**

registrants had their UKCP registration terminated

Top causes of complaints:

**1**

unprofessional communication and/or breakdown in communication

**2**

failure to maintain professional boundaries

**3**

sexual misconduct

# Foreword

**I hope you find this Professional Conduct Committee (PCC) report useful and informative. As always, its purpose is to give members of the public and UKCP members a view into the work of the PCC. However, more importantly, it also allows us all to learn what triggers complaints so we can hopefully avoid them in the future.**

I want to thank all the PCC members who give their time freely to promote confidence in psychotherapy and confidence in the UKCP Complaints and Conduct Process. Thank you also goes to Sunita Thakore, our complaints and conduct manager; Alice Love and Nabil Mekkaoui, our professional standards managers, who complete all the background work on complaints before they reach the PCC; and to Kat Zhou, UKCP's case administrator and panel secretary who ensures hearings and meetings run smoothly.

This year saw a sharp decrease in the number of complaints received. However, referrals to the adjudication panels have increased slightly, mainly due to more allegations of inappropriate sexual behaviour.

The PCC online Learning from Complaints event on 14 June 2024 proved extremely popular. Members' feedback was very positive. We will be running another online event in 2025.

I am confident that the UKCP Complaints and Conduct Process is fit for purpose and is operating well. We aim to consult in 2025 on introducing consensual disposals of complaints. This can speed up the time it takes to dispose of complaints, which is of immense benefit to the complainant and registrant.

*Brian Linfield*

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



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# About UKCP

**The UK Council for Psychotherapy 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 11,000 individual members and more than 70 training and accrediting organisations.

Our register has over 9,000 registrants made up of:

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

Our register is accredited by the government's Professional Standards Authority for Health and Social Care.



# The Professional Conduct Committee

**The Professional Conduct Committee (PCC) is responsible for overseeing the successful functioning of UKCP's Complaints and Conduct Process. 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 manage 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 undertake a root cause analysis at the conclusion of each case to determine the issues driving complaints and identify key areas of concern. They use this information to shape training events and help identify if further policies and guidance are needed.

## PCC members

During 2024, 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.



**The PCC has oversight of each individual case that progresses through the complaints process.**





## Deputy chair

**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.

## 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, Emi 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.

## Professional members

**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 an MSc 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.

During 2024, professional member Rachel Cook left the PCC. We'd like to thank Rachel for her valuable service and time on the committee.

At the time of this report's publication, UKCP is in the process of recruiting new professional and lay members to join the PCC to assist with overseeing complaints and protecting the public and the integrity of the UKCP national register.



# The complaints and conduct team

**The PCC works closely with UKCP's complaints and conduct team. The team manage complaints in accordance with the Complaints and Conduct Process, from the receipt of the complaint through to its resolution.**

The team is made up of four staff: the complaints and conduct manager, two professional standards managers and a case administrator. These staff have extensive experience in handling complaints and regulation in various fields.





# 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.



**The PCC offers advice to the professional standards manager, who then makes the final decision.**



**Before making a formal complaint, most people get in touch with the team to seek advice or discuss their concerns.**

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.

For example, a registrant may not have clearly explained their therapeutic methods or their contract to their client, resulting in confusion. The PCC would advise the registrant to review their contracts and terms, so clients fully understand the obligations and expectations of both parties from the outset.

### Enquiries

As well as working with the PCC to implement the CCP, the complaints and conduct team respond to enquiries, which fall into two 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 receive enquiries from registrants who are concerned about receiving a complaint.

By responding to these enquiries, the team help offer realistic expectations of the process, informing people what the CCP can and cannot look at and exploring what channels the enquirer has taken so far. For example, has the registrant spoken to their supervisor and/or indemnity provider? Has the client discussed their concerns with their therapist?

# Of the 57 complaints UKCP received in 2024:



## 29 were in scope

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

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## 9 were about therapists

who were not UKCP registrants.

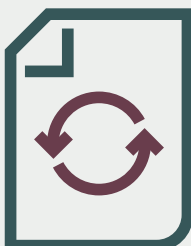
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## 13 were outside the scope of the CCP

– 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.

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## 6 are on hold

– 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.

# Complaints in 2024

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 2024, 0.62% of UKCP registrants had a formal complaint made against them.

## Overview of complaints in 2024

	Jan-Mar	Apr-Jun	Jul-Sep	Oct-Dec	Total
General enquiries received	87	56	48	48	239
Complaint enquiries received	87	86	114	81	368
Complaints received	11	19	12	15	57
Complaints referred to an adjudication panel	2	1	5	1	9
Adjudication panel hearings held	2	0	1	5	8
Preliminary hearings held	2	0	1	0	3
Appeal panel hearings held	1	0	0	0	1
Interim suspension order panel hearings held	0	3	3	2	8



# Terms explained

**General enquiries** – see page 8.

**Complaint enquiries** – see page 8.

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

**Complaints referred to an adjudication panel** – 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 7).

**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 12.

**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 comprises 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.



**Interim suspension order panel hearings can happen at any time during the complaints process.**



# 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.

**The panel can only consider imposing a sanction if they find the registrant's fitness to practise is currently impaired.**

# Adjudication panel hearings in 2024

**There were eight adjudication panel hearings in 2024 concerning five different cases. On three different cases, the adjudication panel convened and considered the case at more than one sitting. All the hearings were conducted remotely and were recorded.**

**Two** cases are still ongoing at the time of this report's publication and will continue into 2025.

**Four** registrants were removed from the register in 2024:

- **Three** cases concluded in 2024, and the registrant was removed from the register (the most serious sanction a panel can impose).
- On **one** occasion in 2024, an appeal panel met to consider an appeal submitted by a registrant in relation to a matter that was adjudicated upon in 2023. The appeal panel dismissed the appeal and agreed with the adjudication panel's decision to remove the registrant from the register.

Termination of registration is a sanction of last resort for serious, deliberate or reckless acts involving abuse of trust (such as sexual misconduct), dishonesty, or persistent and irreparable failure.



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# Adjudication panel member training

Following the previous year’s recruitment of new adjudication panel members, the 16 members who joined throughout 2023 completed their training in the early months of 2024.

If you are interested in assisting on an adjudication panel, please do get in touch with the complaints team ([complaints@ukcp.org.uk](mailto:complaints@ukcp.org.uk)).

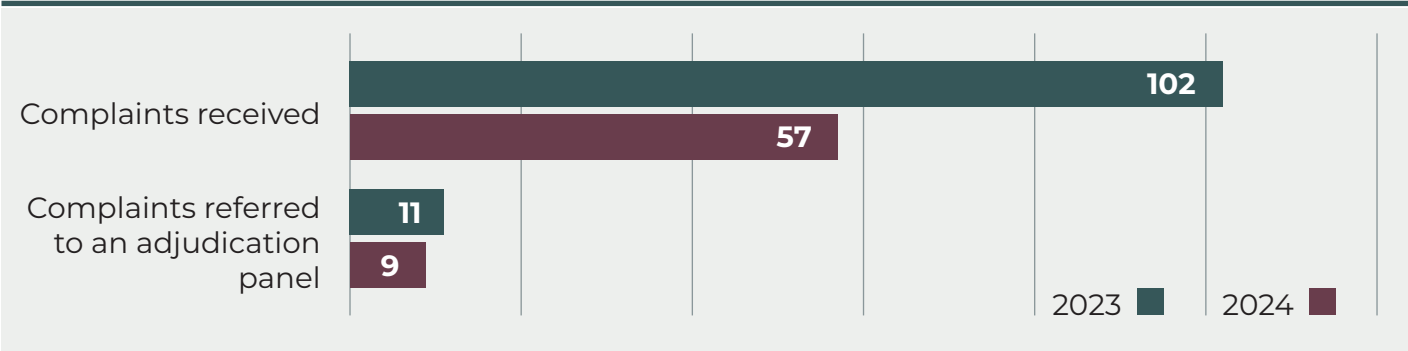
## Year-on-year analysis

UKCP has been collecting complaints data since 2013.

The number of complaints received in 2024 decreased by 56% in comparison to 2023. We believe the decrease in complaints relates to two factors:

- the annual declarations process, whereby members are reminded of their ongoing duty to notify UKCP if they have been the subject of any complaints, or police or disciplinary action
- our Learning from Complaints work in increasing awareness on the common causes of complaints and how to avoid them.

### Comparison of complaints in 2023 and 2024



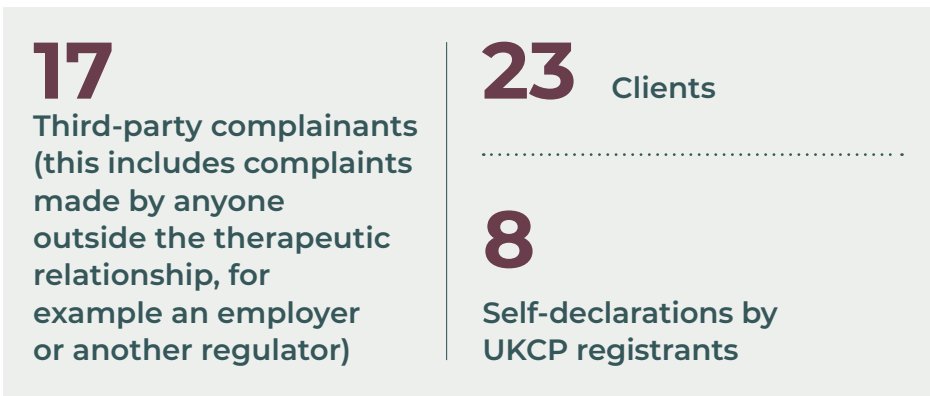


In contrast, the number of complaints referred to an adjudication panel hearing increased by 5% in 2024. This increase reflects the confidence the public place in UKCP to investigate serious complaints with significant public protection implications.

With each of our annual Learning from Complaints events, UKCP aims to increase our members' knowledge on receiving and preventing complaints to ensure public protection.

### Who made formal complaints about UKCP registrants?

UKCP received **48** formal complaints about UKCP registrants. The sources of complaints were:



In 2022, UKCP implemented an online declarations system for membership renewals. All registrants who apply to renew their UKCP membership must confirm whether they have been the subject of any complaints, or police or disciplinary action.

This process is a further step in UKCP's commitment to assure the public and the Professional Standards Authority of the UKCP national register's integrity. It also serves as a helpful annual reminder to registrants of their obligations under the Code of Ethics.

In 2024, 60 UKCP members declared they had been subject to a complaint, police action or disciplinary action. Further action under the CCP was taken in six instances because there was a potential breach of the Code of Ethics. The remainder of the declarations did not indicate a potential breach of the Code of Ethics and were therefore resolved with no further action.

**In 2024, 60 UKCP members declared they had been subject to a complaint, police action or disciplinary action.**

# Understanding the root causes of complaints



**This classification provides a broad oversight of the issues driving complaints and throws up a red flag when certain issues recur.**

**After the PCC considers each case, the complaints and conduct team undertake a detailed root cause analysis to identify the behaviours or situations that triggered the complaint.**

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

This classification 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 of our website.



We conducted a root cause analysis of **37** cases in 2024. The causes of the complaints were:

1. Unprofessional communication and/or breakdown in communication	17
2. Failure to maintain professional boundaries	11
3. Sexual misconduct	5
4. Decision of another body	4
5. Poor management of ending of therapy	4
6. Failure to act within limits of competency	3
7. Dishonesty	2
8. Adverse health	2
9. Breach of client confidentiality	1

As you can see, a few of the cases were categorised into more than one root cause. This is common where the cause of a case is the decision of another body. Under the CCP, UKCP may consider any adverse findings made by other bodies, such as the NHS or other regulators. These adverse decisions can relate to a range of situations, for example, failing to maintain professional boundaries or breaching client confidentiality.

Decisions by other bodies can relate to a range of situations, for example, failing to maintain professional boundaries or breaching client confidentiality.

# Learning from complaints

**UKCP receives complaints that range from serious professional misconduct to expressions of dissatisfaction with a service. Whatever the cause or severity, each complaint is an opportunity for learning.**

On 14 June 2024, the PCC and the complaints and conduct team held their annual Learning from Complaints event. The event offers registrants the opportunity to gain a comprehensive insight into the work of the PCC and receive guidance on case law and topical issues. By highlighting these issues and the causes of complaints, registrants may find ways to avoid circumstances in which trigger points arise.

The 2024 Learning from Complaints event opened with Brian Linfield MBE giving an introduction and an overview of the 2023 Annual Report. Alice Love gave a presentation on the timeline of a complaint, followed by Kat Zhou presenting information about the adjudication panel and the process behind panel members being elected and their crucial role in hearings. Nabil Mekkaoui then presented information on the annual declarations and the self-declaration process. Finally, Sunita Thakore delivered her presentation on psychotherapy contracts, which addressed the benefits of having formal working contracts.

After the event concluded, UKCP sent a survey to attendees requesting their feedback. The majority of attendees who responded confirmed they had attended events with UKCP before. However, for 30% of attendees, the Learning from Complaints 2024 event was their first UKCP event.

The feedback from the event was extremely positive. Here is what some of our attendees liked most:

**‘The clarity of the delivery and how the facilitators seemed to work well attuned to one another.’**

**‘The variety of speakers and styles.’**

**The event offers registrants the opportunity to gain a comprehensive insight into the work of the PCC and receive guidance on case law and topical issues.**



**‘I like the fact that there were different presentations and that you invited audience chat and questions so that the participatory nature helped to stay engaged in thinking about the topics.’**

**‘I liked the case studies and examples. I found Brian’s introduction very helpful and his tone reassuring.’**

**‘I see an event like this as very important to keep practitioners mindful of professional responsibilities. I consider it important to visit these kinds of events regularly.’**

Concluding feedback on the event was wholly positive, with one attendee stating the event was ‘thought-provoking’ and another saying ‘really enjoyed this – I’ve attended multiple times in the past and I have recommended it to others’.

The 2024 Learning from Complaints event was recorded and is available upon request.

## 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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