UKCP AUDIT REPORT

Random Sample Audit 2022

# INTRODUCTION AND OVERVIEW

As part of our quality assurance processes, UKCP undertakes audits of individual registrants. This is not only to ensure the integrity of the register through quality assurance, but also to allow UKCP to continue its obligation as a charity formed for the purpose of protecting the public.

This report is based on findings from UKCP’s annual random sample audit of 3% of registrants in 2022 who have not been audited in the previous 5 years, and also includes any registrants who deferred their audit from 2021.

Those registrants participating in the 2022 audit who were deferred from the previous year were given a revised 2022 deadline and advised that their membership status would be at risk if they did not submit.

All registrants participating in the audit received Audit Guidance Notes advising them to submit evidence of the following:

* Qualifications
* Supervision
* Continuing Professional Development
* Professional Indemnity Insurance

# FINDINGS

## Background

The auditees for 2022 were divided up alphabetically in 7 batches of 30 registrants, an 8th batch of 19 registrants, and a separate batch for the 17 deferred registrants from the 2021 audit. They were notified via email at specific dates throughout the year (avoiding major holiday periods and summer holidays). Registrants were given approximately 4-5 weeks’ notice to submit.

The following figures represent the 246 registrants participating in the 2022 audit process:

* 229 randomly selected UKCP registrants, ie 3% of registrants not audited in the last 5 years
* 17 registrants deferred from the 3% annual audit of 2021

Of the 246 registrants participating, 194 completed and passed the audit. More detailed information on this specific statistic can be found in section 2.6 below.

|  |  |  |
| --- | --- | --- |
| **Year** | **Number participating\*** | **Submissions received** |
| 2022 | 246 | 194 (79%) |
| 2021 | 196 | 162 (83%) |
| 2020 | 234 | 182 (78%) |
| 2019 | 224 | 194 (87%) |
| 2018 | 212 | 177 (84%) |
| 2017 | 218 | 191 (88%) |

We note that there was a 4% decrease in submissions received in 2022 compared to 2021. More information regarding the reasons for withdrawal is provided in section 2.6.

We’ve had a 25% increase in registrants being audited compared to 2021 which is a significant increase to 2021, however in line with the general increase over previous years.

We noticed a minor dip in 2018 and a much larger dip in 2021. 2022 is the highest number of people audited.

Our assumption here is that the pandemic and lockdown had an effect on the 2020 and 2021 membership levels. Many registrants had returned to the UKCP Register by the time we pulled the random list in January 2022.

## Method of Submission

We’ve continued to send out notifications via email requesting that audit submissions be sent by email. 100% of submissions were received by email in 2022. The Audit Form and Guidance Notes does mention that postal submissions by post can be made only under extenuating circumstances. It feels as though everyone has adapted after the pandemic.

Rather than submissions by email, we continue to recommend submitting via an online form/database would be even better. This could potentially guide the auditee through the process more efficiently.

## Submissions received on time

Of the submissions received, i.e. excluding those who were withdrawn, deferred or who resigned registration, the following statistics indicate when submissions were received.

|  |  |  |  |
| --- | --- | --- | --- |
| **Year** | **Total submissions received** | **Received by original deadline** | **Received within 1 month of deadline** |
| 2022 | 194 | 123 (63%) | 33 (17%) |
| 2021 | 162 | 126 (78%) | 13 (8%) |
| 2020 | 182 | 144 (77%) | 17 (9%) |
| 2019 | 194 | 145 (75%) | 34 (18%) |
| 2018 | 177 | 142 (80%) | 20 (11%) |
| 2017 | 191 | 145 (76%) | 36 (19%) |

This shows a 15% decrease for submissions received by the original deadline compared with 2021. There is also a 9% increase in those received within a month of the original deadline. This leaves 20% of submissions that are received over a month after the deadline.

2022 seems to have many more submissions received after the deadline, especially receiving it over a month after the initial deadline. This may be due in part to staffing changes.

## Extensions

We would prefer an extension request to ‘chasing’ non-responsive auditees, as it means our internal deadlines and resources are better managed. As a result, we offered the following number of extensions to those who requested it:

|  |  |  |
| --- | --- | --- |
| **Year** | **Total submissions received** | **Extensions** |
| 2022 | 194 | 52 (27%) |
| 2021 | 162 | 31 (19%) |
| 2020 | 182 | 48 (26%) |
| 2019 | 194 | 50 (26%) |
| 2018 | 177 | 38 (21%) |
| 2017 | 191 | 31 (16%) |

A relatively high amount of extensions were offered compared to previous years, but this generally follows the same pattern of the amount of submissions received in previous years. The average of extensions is 22% so 27% is higher than average, but not excessively so.

A 2022 breakdown of the extensions by batch:

|  |  |  |
| --- | --- | --- |
| **Batch** | **No of auditees** | **Extensions** |
| 0 | 17 | 4 (24%) |
| 1 | 30 | 5 (17%) |
| 2 | 30 | 8 (27%) |
| 3 | 30 | 3 (10%) |
| 4 | 30 | 5 (17%) |
| 5 | 30 | 6 (20%) |
| 6 | 30 | 7 (23%) |
| 7 | 30 | 13 (43%) |
| 8 | 19 | 1 (5%) |

The highest amount of extensions for a batch took place in batch 7. Batch 7 notifications first went out on 26 August with a deadline of 23 September. While most registrants are returning towards the end of August/early September, we will continue to explore the best timings for notification and deadline.

## Submission quality

A number of registrants were contacted upon the first review of their submission because they had not provided all of the requested documents or because their submission information was unclear:

|  |  |  |
| --- | --- | --- |
| **Year** | **Total submissions received** | **Further information requested** |
| 2022 | 194 | 27 (14%) |
| 2021 | 162 | 37 (23%) |
| 2020 | 182 | 53 (29%) |
| 2019 | 194 | 97 (50%) |
| 2018 | 177 | 60 (34%) |
| 2017 | 191 | 44 (23%) |

The percentage of how many times we requested further clarification is much less compared to previous years. Last year’s report noted that the Audit forms and Guidance Notes should be refined and improved, and it reflects in 2022’s numbers. The last few years have shown definitive improvement from the 2019 numbers where 50% of submissions required more information.

A further look into the information that we’re still asking for:

|  |  |
| --- | --- |
| **Further information required** | **Count** |
| Client groups | 3 |
| Client hours | 3 |
| CPD | 5 |
| Insurance | 24 |
| Qualifications | 10 |
| Supervision | 2 |
| True Copy | 3 |
| Unreadable Files | 3 |

Out of the 27 times we asked for further information, 24 were about insurance. This could be because insurance is potentially complicated in relation to dates and expectations.

Some reasons include:

* They provide their latest insurance details when we actually require it for the full audit period.
* They send a full range of insurance documents except for the primary certificate document.
* They have renewed their insurance recently and fail to send their current certificate.

Further clarification about what we require for indemnity insurance may help reduce the numbers, though it can be tricky with so many different insurance companies with different forms.

## Audit completion

Some of those registrants who were audited required feedback on their CPD, supervision, insurance, client hours or client groups to ensure they were meeting UKCP requirements.

|  |  |  |
| --- | --- | --- |
| **Year** | **Total submissions received** | **Required feedback** |
| 2022 | 194 | 13 |
| 2021 | 162 | 11 |
| 2020 | 182 | 10 |
| 2019 | 194 | 24 |
| 2018 | 177 | 33 |
| 2017 | 191 | 22 |

A breakdown of the areas we provided feedback for can be found in sections 2.7 – 2.12 below.

52 auditees did not pass the audit in 2022 for the following reasons:

* 7 were deferred to 2023 due to the following: bereavement, long term covid, divorce and caring for loved ones.  
  **NB:** Dates have been set for their 2023 audit, their notification emails were sent to them in late January 2022 with an extended Summer 2023 deadline.
* 2 failures in 2022. One failed to provide insurance details for 2021 but has provided insurance details up to present. The other failed to meet requirements across 2 separate audit years and was referred to the Registrar and UKCP Membership Committee for removal from the Register. They have been removed from our register.
* 3 retired
* 12 resigned
* 20 were withdrawn due to issues with reporting within the database.
* 6 withdrawn because they were no longer active members
* 1 withdrawn due to being on sabbatical
* 1 withdrawn due to extenuating circumstance

The 20 withdrawals due to database issues will be addressed further in conclusions and recommendations.

**NB:** The UKCP Membership Committee was notified of all registrants who resigned or retired from the register as a result of audit notification. A membership add-on for those who are retiring or winding down is now available for those who wish to take it up. If they do, then it means they are removed from the audit. If the registrant decides they wish to continue practising after the winding down add-on time period is complete, they must complete the audit as well as re-accreditation procedure.   
  
More information on this add-on can be found here: <https://www.psychotherapy.org.uk/join-us/joining-faqs/pre-retirement-add-on/>

**NB:** The following statistics have been tracked in this and previous years in relation to the audit:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Year** | **Resigned registration** | **Retired from the Register** | **Removed from the Register for not submitting** | **Total who left the Register** |
| 2022 | 12 | 3 | 1 | 16 |
| 2021 | 3 | 5 | 0 | 8 |
| 2020 | 5 | 6 | 9 | 20 |
| 2019 | 1 | 5 | 5 | 11 |
| 2018 | 2 | 8 | 5 | 15 |
| 2017 | 4 | 2 | 4 | 10 |

**NB:** Normally any registrants who have resigned or allowed their UKCP registration to lapse since they were selected for audit will not be able to renew their UKCP registration until they have submitted audit documents and completed the audit process.

2020 was the year people were leaving due to the pandemic.

2021 the number was low due to most people having already left in 2020.

2022 registration, while high in January when we pulled the 3% numbers, decreased during the year due to cost of living or people deciding to retain only one membership.

NB: This is speculation and anecdotal and should not be considered the full set of reasons.

## Qualifications

Most audit submissions contained evidence of post graduate certificates and psychotherapy-specific training and short courses, and a few included 1st degree certificates.

10 registrants either did not initially provide qualifications, or did not obtain certification of true copy, and it was necessary to request additional information or evidence. Reasons for not supplying qualifications included the following:

* The auditee having moved/moving and have packed/misplaced documents.
* The auditee qualified many years ago and misplaced documents.
* The auditee qualified long enough ago that there was no qualification or letter confirming graduation or accreditation.
* The auditee assumes that this requirement does not apply to them. Normally their thinking is that this information was supplied to UKCP when they originally registered with UKCP.
* The auditee misunderstood what the team were requesting.

## Client Groups

Auditees were asked which of the following client groups they work with:

* Individuals
* Groups
* Couples
* Families
* Children and young people

Primarily this information is captured for statistical purposes so that we are better informed about the client groups with whom our registrants work.

Generally, auditees were clear regarding which of the above groups that they worked with during the audit year. Only 3 auditees were asked for further information regarding their client groups.

## Client Hours

The following table shows the broad employment contexts that auditees practiced in 2021:

|  |  |  |  |
| --- | --- | --- | --- |
| **Year** | **Total submissions received** | **Employment Context** | **Number of auditees working in this context** |
| 2021 | 194 | Private Practice | 156 |
| Practice through employer | 81 |
| Private practice AND practice through employer | 43 |

Our registrants undertake a wide range of clinical hours throughout the year in these employment contexts:

|  |  |
| --- | --- |
| **Type and amount of client practice** | **Number of hours** |
| Lowest hours in private practice | 24 |
| Lowest hours in employed practice | 20 |
| Highest hours in private practice | 1421 |
| Highest hours in employed practice | 1400 |
| Lowest total combined hours by one individual | 116 |
| Highest total combined hours by one individual | 1680 |

No auditees received feedback regarding their client hours this year. It is important to bear in mind that UKCP does not set clinical hours in its policies (though the colleges might), and therefore registrants are unlikely to receive ‘client hours’ feedback as part of the audit unless they are undertaking no relevant clinical practice at all.

Most registrants practicing privately undertake between 100-300 hours, and the next largest group of auditees practice up to 700 hours.

In relation to Employed Practice hours, most registrants range up to 300 hours. There are fewer who go beyond this compared to Private Practice.

## Supervision

This section is divided into 2 parts – 1) Receiving Supervision and 2) Supervising Others.

## Receiving Supervision

Most audit submissions presented evidence of the type, frequency and duration of supervision received and were found to be meeting recommended guidelines. Most submissions were in one of the following forms:

* A statement (either in the form of a signed letter or an email) from the supervisor stating the frequency and duration of supervision, sometimes including a brief statement of their opinion of the registrant.
* A log stating the name of the supervisor and dates the registrant and supervisor met, generally signed or initialled by the supervisor.
* A brief statement from the registrant or peer regarding attendance at peer and/or group supervision. This statement was normally further endorsed by the supervisor, facilitator or other peer within the group.

We added a statement to the audit notification and the audit form, which is written in full in the conclusion in section 3.2, to acknowledge and offer solutions for any issues auditees may still be facing in getting this supporting evidence remotely or without seeing their supervisor in-person.

Only 2 registrants did not provide enough information and were asked to send additional information or clarification.

No registrants received feedback regarding requirements for the level or appropriateness of supervision this year.

It’s important to bear in mind that UKCP does not set minimum supervision hours in its policies (though the colleges might), and therefore registrants are unlikely to receive supervision feedback as part of the audit unless they are undertaking no supervision at all.

## Supervising Others

We asked registrants whether they were supervising others, and the hours they spent with those supervisees.

Of the 194 registrants who completed a submission, over half, 107, said they supervised others. This ranged from a total of 4 hours to 560 hours for the year. The majority range from 4-150 hours.

At the upper end of the scale the individual with the highest hours supervising others (560) was also undertaking 231 client hours in private practice.

The registrant with the lowest hours supervising others, providing 4 hours of supervision, was also undertaking 979 hours of private practice.

## Evidence of CPD

As with previous audits, we asked registrants to provide evidence of CPD activities undertaken within the audit period.

UKCP recognises that the CPD policies of its organisations and colleges are likely to be varied and need to reflect the diversity of the modalities and client groups. They should have the flexibility to allow individuals to develop in ways that are meaningful to them.

Bearing this in mind, registrants were informed that any of the following would be acceptable as evidence of CPD:

* A log of CPD and corresponding hours, as well as:
* Course attendance certificates or receipts
* Seminar, workshop or conference attendance certificates or receipts
* Teaching work
* Committee work
* Subscriptions to professional journals
* Peer review reports

Most registrants provided a log or statement of the CPD that they had completed over the past year. Most of these auditees completed the sample CPD form that we provided, making it easier to see the variety of CPD undertaken. A few auditees used their organisation’s own form. In some cases, this was due to the fact that these had already been completed to comply with their OM’s/employer’s CPD policies and procedures.

The majority of CPD reviewed revealed a varied mix amongst registrants with a majority reading psychotherapy and related journals, and attending relevant workshops, lectures, seminars and conferences.

The majority of registrants also submitted supporting evidence in the form of certificates from courses, workshops and conferences attended or undertaken over the last 12 months.

It was necessary to contact 5 auditees to submit or provide additional CPD evidence. 5 registrants received feedback regarding their CPD, with most being advised to increase the variety of CPD in order to meet UKCP and college requirements.

The minimum number of CPD hours expected of our registrants is 20 hours in any given year, with a minimum total of 250 hours to be achieved over a 5-yearly period.

Whether someone is practising via an employer or practising privately does not necessarily have any bearing on CPD hours, as evidenced by looking at the 2 highest and 2 lowest CPD achievers who were audited. It’s important to note that the auditees with the lowest CPD hours were given feedback on this.

|  |  |  |  |
| --- | --- | --- | --- |
| **Location of Registrant on list of CPD hours** | **CPD Hours** | **Employed Client Hours** | **Private Practice Client Hours** |
| Low CPD | 10.5 | 0 | 85 |
| Low CPD | 17 | 0 | 332 |
| High CPD | 895 | 0 | 231 |
| High CPD | 1152 | 0 | 274 |

The majority of auditees had about 20-150 hours of CPD. There were outliers who had 600 – 800 hours of CPD. The highest amount was 1152 hours of CPD.

Of the 194 auditees who submitted for the audit, the average CPD was 123 hours for the year.

## Insurance

Evidence of professional indemnity insurance was provided with the vast majority of submissions. In most of the remainder submissions (for example, registrants who practice within the NHS) insurance is covered by the employer and a brief statement was usually sent instead.

Many of the auditees held professional indemnity cover privately through various insurers, including Balens, Holistic Insurance Services, Howden, Oxygen, PPS, Towergate, and others.

24 auditees did not include a statement that they were covered by their employer or did not include full proof of professional indemnity insurance (either current or from the audit period) and had to be contacted to send further evidence.

The majority of those contacted for further evidence had sent some evidence of insurance with their initial submission but had not sent evidence covering the full audit period (multiple certificates are required). In some cases, auditees sent their insurance policy but not certificates, and were therefore chased for additional info.

**NB:** It is important to note this is the key item that we chase auditees for when reviewing submissions.

|  |  |  |
| --- | --- | --- |
| **Year** | **Total submissions received** | **Registrants chased for additional insurance info** |
| 2022 | 194 | 24 (12%) |
| 2021 | 162 | 27 (17%) |
| 2020 | 182 | 33 (18%) |
| 2019 | 194 | 68 (36%) |
| 2018 | 177 | 32 (18%) |
| 2017 | 191 | 26 (14%) |

With only 27 requests for further information and having 24 of them related to insurance, that’s 88% of further information requests related to insurance.

# CONCLUSIONS

## Regarding 2021’s Recommendations

We’re out of lockdown compared to 2021. Almost everyone has adapted to being able to work from home and provide the relevant data digitally. There were no postal submissions and we’ve successfully completed a paperless process. There was only one postal submission in the previous year and now there are none. Unfortunately, this is not a fully green process due to having to still sending out “severely late” notifications.

The updates to the Guidance Form have improved our submission rates and reduced our request for further information.

## Conclusions for 2022 Annual Random Audit:

Compared to previous years, we’ve had an increase number participating from previous years especially compared to 2021 where there is a significant drop.

100% submissions received by e-mail. This is a good sign that we’re going green, however final notice letters are still posted for non-responsive registrants.

We have had fewer submissions received on time compared to previous years and in conjunction, the highest number of extensions compared to previous years. The extensions peaked for batch 7. This could be due to the timing of when the notifications are sent. Batch 7 is in a period of the end of the summer holiday and the beginning of the new school year. Psychotherapy is all year but still subject to holiday patterns of the season, with most of our members away in August.

We’ve had to do fewer requests for further information compared to previous years. This is a good sign that the Audit guidance form is working well. Insurance is the main piece of information requested overall.

20 auditees were withdrawn from the process due to database reporting errors. This has since been fixed, but we did not add an additional 20 to the list, as the process was well underway by the time we realised the error.

A slightly above average number of registrants left the register. This could be related to post pandemic working, cost of living and preferring one registering body, or etc.

Generally, there are more people are in private practice with a spread of up to 700 hours of practice compared to fewer people in employed with the majority up to 300 hours of practice.

# RECOMMENDATIONS

The impact of the pandemic itself may have passed. With lock downs in 2020 and 2021, there may still be a small amount of disruption, but everyone should have been able to adapt, undertaking hybrid working or online CPD and supervision.

There were 20 withdrawals that were no fault of the registrant. We will continue to improve our selection process and database reporting to avoid these issues in future.

Insurance and qualifications seem to be the main two areas where we are frequently asking for further information. We will continue to update the audit form to ensure clarity.

While we do set deadlines for responses when we require additional information or submission, this isn’t captured in the report. Often we have to chase auditees a number of times to acquire the information required. We are currently undertaking a review of our operational process to ensure it is streamlined, efficient and relevant to what the process should accomplish. We will explore how we can capture this operationally.

We’ve noticed that batch 8 often isn’t able to meet the deadlines for the December Membership Committee meeting if there were any registrants recommended for removal due to failure to meet requirements or response to the audit. There is a risk where if there were any registrants for removal, those registrants would not be removed before the committee’s February meeting. We would like to tighten the reminder process while still keeping in line with the removal process, but we may also consider removing batch 8 altogether and increasing the size of the other 7 batches to ensure ample time at the end of the year to complete any final stages of the audit process.