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# UKCP AUDIT REPORT

## Random Sample Audit 2023

### 1. 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 2023 who have not been audited in the previous 5 years, and also includes any registrants who deferred their audit from 2022.

Those registrants participating in the 2023 audit who were deferred from the previous year were given a revised 2023 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

### 2. FINDINGS

#### **2.1 Background**

The auditees for 2023 were initially divided up alphabetically in 7 batches of 28 registrants, an 8th batch of 11 registrants, and a separate batch 0 for the 7 deferred registrants from the 2022 audit. In April 2023, batches 4-8 were revised to remove batch 8 and only have batches 4-7 with 32 registrants in batches 4-6 and 27 in batch 7. 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 214 registrants participating in the 2023 audit process:

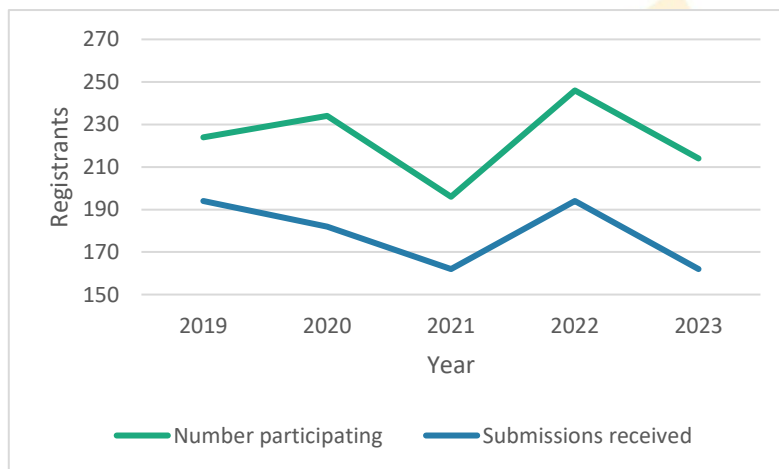
- 207 randomly selected UKCP registrants, ie 3% of registrants not audited in the last 5 years
- 7 registrants deferred from the 3% annual audit of 2022

Of the 214 registrants participating, 166 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
2023	214	166 (78%)
2022	246	194 (79%)
2021	196	162 (83%)
2020	234	182 (78%)
2019	224	194 (87%)

We note that there was a further 1% decrease in submissions received in 2023 compared to 2022. This is the lowest amount comparable to 2020. More information regarding the reasons for withdrawal is provided in section 2.6.

There was a 13% decrease in registrants being audited compared to 2022 which is comparable to previous years.



We noticed a minor decrease in 2018 and a much larger dip in 2021. 2022 is the highest number of people audited. 2023 has gone back down.

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.

## **2.2 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 2023. 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.

### **2.3 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.

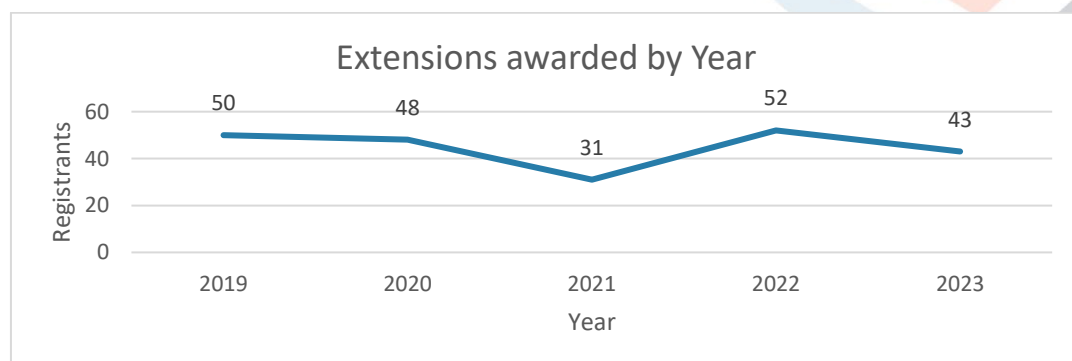
Year	Total submissions received	Received by original deadline	Received within 1 month of deadline
2023	166	136 (82%)	27 (16%)
2022	194	123 (63%)	33 (17%)
2021	162	126 (78%)	13 (8%)
2020	182	144 (77%)	17 (9%)
2019	194	145 (75%)	34 (18%)

2023 has seen a higher percentage of submissions received by the original deadline and a higher than average percentage within 1 month of the deadline. With 98% of submissions received within 1 month of the deadline, this is a significant improvement from the previous year. This could be due to the stability of the staff and we hope to continue this trend.

### **2.4 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
2023	166	43 (26%)
2022	194	52 (27%)
2021	162	31 (19%)
2020	182	48 (26%)
2019	194	50 (26%)



While the number of extensions offered is lower compared to last year, it is still higher than the average of 23% but only marginally. This is within the trend that is seen here.

A 2023 breakdown of the extensions by batch:

Batch	No of auditees	Extensions
0	7	4 (57%)
1	28	7 (25%)
2	28	5 (18%)
3	28	5 (18%)
4	32	4 (13%)
5	32	4 (13%)
6	32	8 (25%)
7	32	6 (19%)
8	0	0

The highest amount of extensions for a batch took place in batch 6. Batch 6 notifications first went out on 21 July with a deadline of 25 August. This could be due to the summer break and registrants received their notification while they were away.

Batch	Notification	Deadline	Days
0	27/01/2023	30/06/2023	154
1	27/01/2023	03/03/2023	35
2	03/03/2023	31/03/2023	28
3	31/03/2023	12/05/2023	42
4	12/05/2023	16/06/2023	35
5	16/06/2023	21/07/2023	35
6	21/07/2023	25/08/2023	35
7	25/08/2023	22/09/2023	28
8	22/09/2023		

Batch 3 notifications are deliberately longer to take into account the Easter break. Batches 2 is shorter because there are no holidays as such during that period and there has been no indication of significant extensions during that time. Batch 7 has a scheduled deadline of 22 September, but with the removal of batch 8, it could be extended to 35 days.

## **2.5 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
2023	166	47 (28%)
2022	194	27 (14%)
2021	162	37 (23%)
2020	182	53 (29%)
2019	194	97 (50%)

The percentage of how many times we requested further clarification is more than the previous years but is the average amount that we're expecting overall.

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

Further information required	Count
Client groups	4
Client hours	4
CPD	16
Insurance	26
Qualifications	16
Supervision	16
Evidence of it being a true copy	11

A significant amount is still asking for further information on Insurance. Most provide one certificate of insurance to say that they are insured, but we require the coverage of the full audit year which will require at least two to cover both halves of the year.

2023 has seen a few registrants fail the audit due to not having the appropriate insurance in place.

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.

## **2.6 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
2023	166	4
2022	194	13
2021	162	11
2020	182	10
2019	194	24

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

50 auditees did not pass the audit in 2023 for the following reasons:

- 10 were deferred to 2024 due to the following: bereavement, long term covid, divorce and caring for loved ones.  
**NB:** Dates have been set for their 2024 audit, their notification emails were sent to them in late January 2024 with an extended Summer 2024 deadline.
- 4 failures in 2023. Two failed to provide insurance details for 2022 but have provided insurance details up to present. One failed due to a break in practice. The last one did not engage with the process and was referred to the Registrar and UKCP Membership Committee for removal from the Register, however they did not renew membership and did not engage with the OM reaccreditation. To re-register with UKCP, they will need to complete their reaccreditation with their OM and potentially audit again.
- 5 retired.
- 3 resigned.
- 23 were withdrawn due to issues with database reporting.
- 1 withdrawn due to being on sabbatical.
- 1 withdrawn due to extenuating circumstance.
- 1 case is still in progress. They have provided most details except for supporting evidence for CPD. Ample time has been provided for this information and a 30 day letter has been sent at the time of this report. The case will be referred to the Membership Committee if the auditee does not complete the process.

The 23 withdrawals are due to database issues will be addressed further in conclusions and recommendations.

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/>



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
2023	3	5	1	9
2022	12	3	1	16
2021	3	5	0	8
2020	5	6	9	20
2019	1	5	5	11

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.

## **2.7 Qualifications**

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

26 registrants either did not initially provide qualifications, and/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.

## 2.8 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 4 auditees were asked for further information regarding their client groups.

## 2.9 Client Hours

The following table shows the broad employment contexts that auditees practiced in 2022:

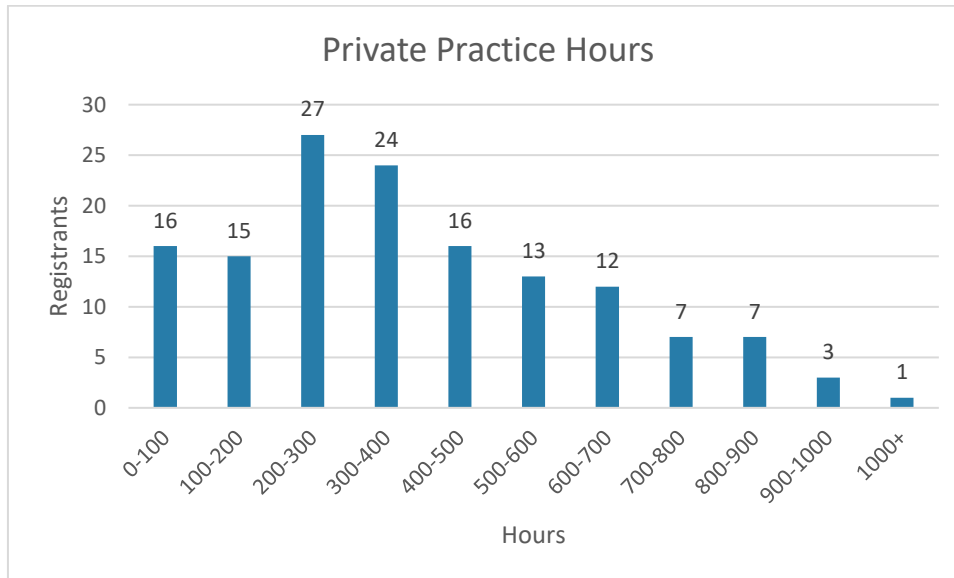
Year	Total submissions received	Employment Context	Number of auditees working in this context
2022	166	Private Practice	110
		Practice through employer	28
		Private practice AND practice through employer	31

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

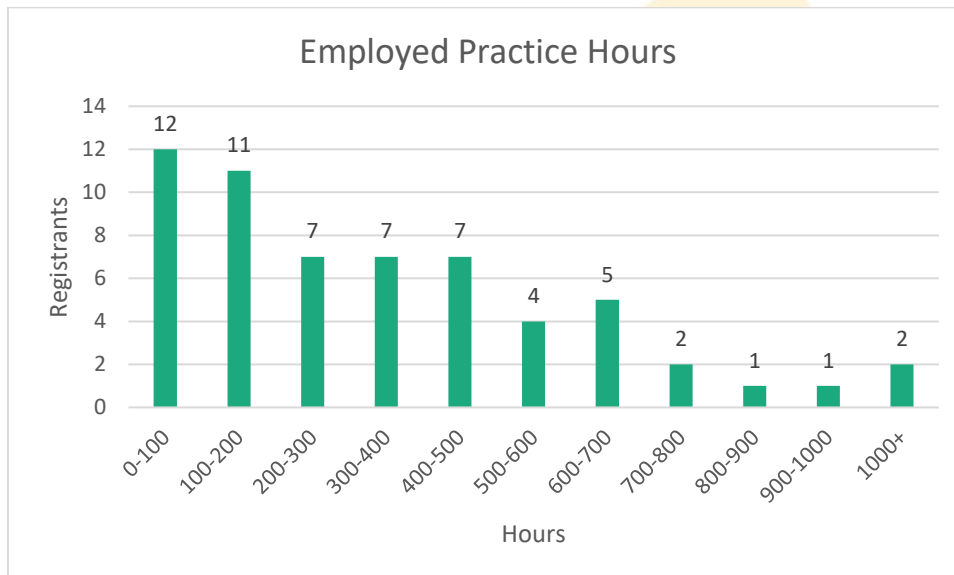
Type and amount of client practice	Number of hours
Lowest hours in private practice	3
Lowest hours in employed practice	20
Highest hours in private practice	1239
Highest hours in employed practice	1350
Lowest total combined hours by one individual	99
Highest total combined hours by one individual	1257

No auditees received feedback regarding their client hours this year. 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 200-400 hours.



For Employed Practice hours, most registrants range from 0-200 hours in 2022.

## **2.10 Supervision**

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

### 2.10.1 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.

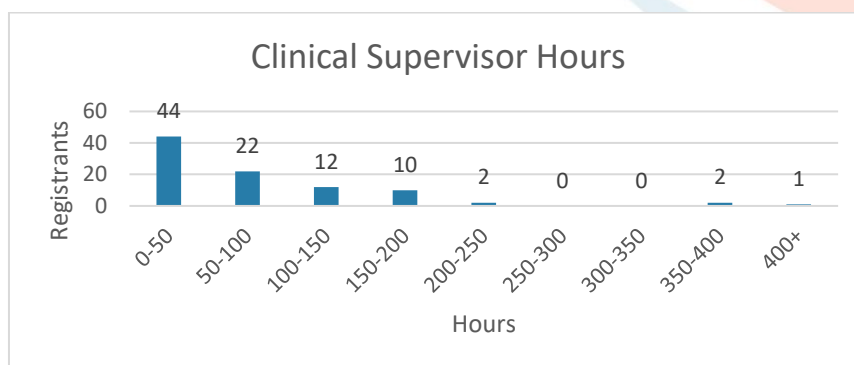
16 registrants did not provide enough information and were asked to send additional information or clarification.

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.

### 2.10.2 Supervising Others

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



Of the 166 registrants who completed a submission, over half, 93, indicated they supervised others. This ranged from a total of 2 hours to 472 hours for the year. The majority range from 0-100 hours.

At the upper end of the scale the individual with the highest hours supervising others (472) was also undertaking 309 client hours in private practice.

The registrant with the lowest hours supervising others, providing 2 hours of supervision, was also undertaking 450 hours of private practice.

## **2.11 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.

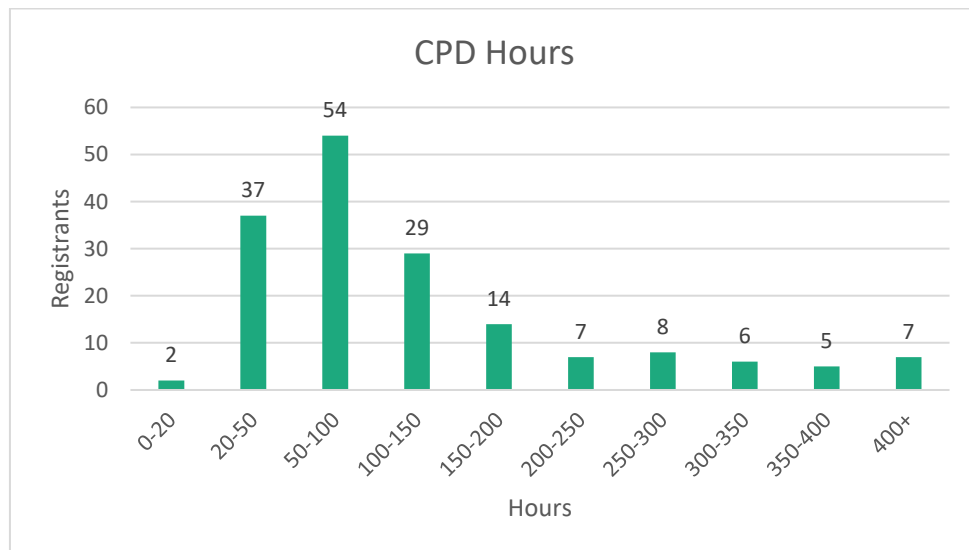
The majority of CPD reviewed revealed a varied mix amongst registrants with a majority reading psychotherapy and related journals, and attending relevant workshops, lectures, seminars and conferences. The majority of registrants also submitted supporting evidence in the form of certificates from courses, workshops and conferences attended or undertaken over the last 12 months.

It was necessary to contact 16 auditees to submit or provide additional CPD evidence. 3 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	17.5	0	504
Low CPD	20	250	0
High CPD	712.5	0	548
High CPD	1405	0	98



The majority of auditees had about 20-150 hours of CPD. There were outliers who had 600 – 1400 hours of CPD. The highest amount was 1405 hours of CPD with the second highest only half that amount with 712.5 hours. The highest amount of CPD was mainly linked to research and publishing.

Of the 166 auditees who submitted for the audit, the average CPD was 142 hours for the year. Removing the two outliers, the average comes down to 131 hours.

## **2.12 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.

26 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 auditees fail to submit or fully submit.

Year	Total submissions received	Registrants chased for additional insurance info
2023	166	26 (16%)
2022	194	24 (12%)
2021	162	27 (17%)
2020	182	33 (18%)
2019	194	68 (36%)

The number of registrants chased for additional information on their insurance is relatively the same as previous years. Even the percentage of 16% is close to the average of 18%.

## 3. CONCLUSIONS

### **3.1 Regarding 2022's Recommendations**

More information being requested of auditees has happened compared to the previous year, despite a higher amount of auditees submitting their documents on time. Prior staffing changes followed by improved communication also had an impact.

There is a similar amount of withdrawn cases compared with previous years. 2023's selection was already underway when a potential fix was agreed. (Due to a database reporting error, a number of registrants were randomly selected incorrectly, including those who had already been audited in the past 5 years or who had only recently joined the register.)

In April, batch 8 was removed and batches 4-7 were rejigged for the remaining auditees.

### **3.2 Conclusions for 2023 Annual Random Audit:**

To resolve the withdrawn auditee issue, a 5% random selection of registrants was initially made and then a 3% selection was made from the 5%. This is so that if we do have any more withdrawn, another registrant can be added quickly from the remaining 2%.

The number of participants in 2023 is fewer than last year but comparable to previous years.

While we've had 100% notifications sent, and submissions received, by e-mail, paper final notice letters are still posted for non-responsive registrants. This year there were 2 final notice letters sent.

The percentage of auditees who participated in the process is one of the lowest due to the number withdrawn, but we also have had the highest percentage of submissions within a month of the deadline. The selection process can be improved to increase the number of participants and minimise the number of withdrawn selections. The 2024 selection of auditees had the change in process and will be reflected in 2024's report.

Professional indemnity insurance remains the one item that is requested most for further information. We endeavour to improve the Guidance Notes to help auditees understand what documents we're looking for. We will also recommend a reminder is sent out to registrants as part of regular communications.

Batch 8 was removed part way through the year, with all batch 4-8 auditees being reassigned to batches 4-7, in line with the prior report's improvements. Timing wise, if there were any problems with batch 8 submissions, they would not be able to be submitted to the Membership Committee to be reviewed and/or removed before the end of the year. They would then overlap with the next audit year.

The number of people who left the register is below average but still comparable to previous years.

There are generally more people in private practice with an average of 200-400 hours of practice compared to fewer people in employed practice. The majority of those employed are doing up to 200 hours of practice.

## 4. RECOMMENDATIONS

There were 25 withdrawals that were no fault of the registrants. We have improved our selection process and database reporting to avoid these issues in future. The selection process will remove the withdrawals due to incorrect selection and also provide an extra 2% pool of randomly selected registrants, if needed.

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 guidance notes or consider wider communications to ensure clarity.

The extensions awarded suggest that batch 6 deadlines should be reviewed and potentially batch 7. This was also the case for last year. Allowing more time for these may help that the August/September summer break.

While we 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 receive the additional information. 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.



Ensure clarity around the Notes document's qualifications section – ie if there isn't a qualification, then we can be flexible about what could be received as evidence, such as a letter from the OM which confirms the original accreditation date.

