ICPHAA

Irish Counselling, Psychotherapy & Allied Healthcare Professionals Association

REGULATION, LAW & DATA PROTECTION

Compliance Procedures

The step-by-step procedures ICPHAA uses to confirm that members meet the conditions of membership, to check evidence, and to resolve non-compliance fairly, consistently and proportionately.

REFERENCE	ICPHAA-POL-25	VERSION	1.0
EFFECTIVE	9 November 2026	NEXT REVIEW	9 November 2027
POLICY OWNER	ICPHAA Board of Directors		

Compliance Procedures

APPLIES TO	Every ICPHAA member, and the Registry and Accreditation Department staff who operate these procedures.
VERSION	1.0 · effective 9 November 2026 · next review 9 November 2027
POLICY OWNER	ICPHAA Board of Directors
CONTACT	ICPHAA Registry · admin@icphaa.ie

AT A GLANCE

- Four procedures: annual renewal, evidence checks, members' own notifications, and handling non-compliance.
- Every step follows fair procedure: notice, a chance to respond, an impartial decision and written reasons.
- Most issues are resolved by agreement, guidance and a reasonable period to put things right.
- Serious or unremedied matters are referred under the Fitness to Practise Policy or Disciplinary Procedures.
- Members may ask for an administrative decision to be reviewed by someone not involved in it.

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1. Purpose

These procedures put the ICPHAA Regulatory Compliance Policy into practice. They describe how the Irish Counselling, Psychotherapy & Allied Healthcare Professionals Association (ICPHAA) confirms that members continue to meet the conditions of membership and the requirements for their membership category, how evidence is checked, and how any shortfall is resolved.

A credible professional association must be able to show that the standards it sets are actually met. These procedures are designed to do that in a way that is supportive of members, fair to everyone involved and focused on the protection of the public.

2. Scope

These procedures apply to all ICPHAA members in every membership category. They cover:

- **Procedure A** – annual renewal and declarations;
- **Procedure B** – compliance checks of supporting evidence;
- **Procedure C** – notifications made by members about changes in their circumstances;
- **Procedure D** – handling identified non-compliance.

They do not cover complaints about a member's professional conduct made by a client, a colleague or a member of the public. Those are handled under the Complaints Procedures. Where a compliance matter raises a question about a member's fitness to practise, or may amount to misconduct, it is referred under the Fitness to Practise Policy or the Disciplinary Procedures, which have their own safeguards and rights of appeal.

3. Principles of fair procedure

Every step taken under these procedures follows the principles of natural justice and fair procedure.

- **Notice.** A member is told in writing what the concern is and what evidence it rests on.
- **A chance to respond.** The member has a reasonable opportunity to respond, provide evidence and explain any circumstances, before a decision is made.
- **Impartiality.** Decisions are made by someone with no personal interest in the outcome. Anyone with a conflict of interest steps aside.
- **Reasons.** Decisions are given in writing with reasons and, where relevant, information about review.
- **Proportionality.** The response reflects the seriousness of the issue and the risk to the public, and is directed at protection and improvement rather than punishment.
- **Accessibility.** ICPHAA makes reasonable adjustments for members with a disability or other barrier to participation.
- **Confidentiality.** Information is shared only with those who need it and is handled in line with the Legal & Data Governance Policy.
- **Timeliness.** Matters are progressed without unnecessary delay, and members are kept informed of progress at each key stage.

4. Procedure A: annual renewal and declarations

1. Before the renewal date, the ICPHAA Registry sends each member a renewal notice with the declaration for their membership category and a link to the current ICPHAA accreditation requirements.
2. The member completes the declaration, confirming that they continue to meet the conditions of membership, including the supervision, CPD and practice requirements for their category, current professional indemnity insurance, and compliance with the ICPHAA Code of Conduct for Members.
3. The member declares any matter that may affect their membership or fitness to practise (see Procedure C), even if it has been notified before.
4. The member uploads or sends any evidence the renewal notice asks for, such as a current insurance certificate.
5. The Registry checks that the declaration is complete. Incomplete renewals are returned with a clear explanation of what is missing.
6. Where the declaration is complete and raises no issue, membership is renewed and the member's status on www.icphaa.ie/verify-certificate is updated.
7. Where the declaration discloses a matter that needs consideration, the Registry refers it to the Accreditation Department or, if it raises a fitness to practise question, under the Fitness to Practise Policy. Renewal may be held until the matter is resolved.

> **ACCURATE DECLARATIONS**
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> A declaration is a professional statement. Knowingly making a false or misleading declaration is a serious matter and may be dealt with under the Disciplinary Procedures.

5. Procedure B: compliance checks of evidence

1. The Accreditation Department carries out periodic checks of a sample of renewal declarations. Members may also be asked for evidence where there is a specific reason to verify a declaration.
2. The member is told in writing which evidence is required, why, and the reasonable period within which to provide it.
3. Typical evidence includes supervision logs or confirmation from a clinical supervisor who meets ICPHAA's supervisor criteria, CPD records with reflective notes, practice logs, insurance certificates and, where relevant, vetting confirmation.
4. The Accreditation Department reviews the evidence against the requirements for the member's category in the ICPHAA accreditation requirements.
5. The member is told the outcome in writing. If the evidence is satisfactory, the check is closed and recorded.
6. If the evidence shows a shortfall, or is not provided, the matter moves to Procedure D.

6. Procedure C: notifications by members

1. A member who becomes aware of a change that may affect their membership or fitness to practise tells the ICPHAA Registry promptly at admin@icphaa.ie. Relevant changes are listed in the Regulatory Compliance Policy and include a lapse in insurance, a change in supervision, a criminal charge or conviction, a finding by another body, a significant health matter or a claim arising from professional work.
2. The Registry acknowledges the notification and, if needed, asks for further information.
3. The Registry decides, with the Accreditation Manager where appropriate, whether the matter can be resolved administratively, needs agreed steps under Procedure D, or must be referred under the Fitness to Practise Policy.
4. The member is told in writing how the matter will be handled and what, if anything, they need to do.
5. Where a member's insurance has lapsed, the member must not practise until cover is reinstated and evidence has been provided.

7. Procedure D: handling identified non-compliance

1. **Identification.** Non-compliance may come to light through renewal, a compliance check, a member's own notification or other information received.
2. **Initial assessment.** The Accreditation Manager, or another impartial person designated by the Board, assesses the matter: what requirement is not being met, why, and whether there is any risk to clients or the public.
3. **Notice to the member.** The member receives a written notice setting out the issue, the evidence relied on and the options available, and is invited to respond within a stated, reasonable period.
4. **Response and discussion.** The member responds in writing and may ask for a meeting, in person or online, and may be accompanied by a support person or colleague.
5. **Decision.** The decision-maker considers the response and decides, on the balance of probabilities, whether non-compliance is established and what should follow.
6. **Outcome and plan.** Where possible, the outcome is a written plan agreed with the member, setting out the steps required and the date by which they will be completed.
7. **Follow-up.** The Accreditation Department confirms whether the plan has been completed. If it has, the matter is closed and recorded. If it has not, the matter may be escalated.
8. **Referral.** Serious, repeated or unremedied non-compliance, or any matter suggesting a risk to the public, is referred under the Fitness to Practise Policy or the Disciplinary Procedures.

8. Outcomes and review of decisions

SITUATION	TYPICAL OUTCOME
Minor or administrative shortfall, promptly put right	Guidance and a note on file; matter closed.
Shortfall in category requirements that the member is willing to remedy	Agreed plan with a completion date; renewal may be held until completion.
Membership requirements not met and not remedied within the agreed period	Membership lapses or the member is offered a category whose requirements they meet; status updated on the verification page.
Serious, repeated or dishonest non-compliance, or any risk to the public	Referral under the Fitness to Practise Policy or Disciplinary Procedures.

A member who disagrees with a decision made under Procedures A to D may ask, in writing to admin@icphaa.ie, for it to be reviewed. The review is carried out by a person nominated by the Board who had no involvement in the original decision, and who may confirm, change or set aside the decision. The member receives the outcome in writing with reasons. Decisions taken under the Fitness to Practise Policy or the Disciplinary Procedures are reviewed or appealed under those procedures.

9. Support, records and confidentiality

ICPHAA recognises that being asked to account for one's practice can be stressful. Members are encouraged to seek support from their clinical supervisor, their own therapist or a trusted colleague, and can contact the Registry at any stage for an explanation of the process. Intimidation or harassment of anyone involved in a compliance matter will not be tolerated.

The Registry keeps a record of each compliance matter, the evidence considered, the decision and the reasons, in line with the Records of Decision Policy. Records are kept securely, shared only on a need-to-know basis and retained in line with the Legal & Data Governance Policy. Anonymised information about compliance outcomes is used to improve guidance and policy.

10. Monitoring and review

The ICPHAA Board of Directors owns these procedures and receives regular summary reports on renewals, compliance checks, notifications and outcomes. The procedures are reviewed by the date shown on the cover, and earlier where experience, legal developments or statutory regulation show that changes are needed. Comments are welcome at admin@icphaa.ie.

READ ALONGSIDE

- Regulatory Compliance Policy
- Professional Standards & Accreditation Policy
- Fitness to Practise Policy
- Disciplinary Procedures
- Complaints Procedures
- Records of Decision Policy

DOCUMENT CONTROL

VERSION	DATE	CHANGE	APPROVED BY
1.0	9 November 2026	Reissued in the ICPHAA policy framework (replaces the former ICPA version).	ICPHAA Board of Directors

Support · Develop · Empower