

# BRITISH/ PSYCHOANALYTIC /COUNCIL

## Reporting Concerns to Third Parties

### Criminal offence

1. If, during the course of an investigation, the BPC becomes aware that a crime has been committed, the BPC will consider whether to contact the Police and provide them with a copy of the relevant information.
2. When considering whether to contact the Police and make a disclosure, the BPC will consider the information within their possession, the rights of the parties concerned; in particular, the disclosure of any personal or confidential information and whether a General Data Protection Regulation (GDPR) exemption applies, and the gravity of the crime committed. The BPC will also consider the need to protect the public and uphold the public interest.
3. The Chief Executive Officer will be consulted at first instance prior to any disclosure(s) being made. The BPC will also be mindful not to 'tip off' the relevant individual who is the alleged perpetrator of the crime.
4. Where a disclosure is required, the BPC will contact the Metropolitan Police (or another Police Constabulary where appropriate) and make a disclosure. The BPC will either make a disclosure via telephone (Tel No: 101) or online at [www.met.police.uk/ro/report/ocr/af/how-to-report-a-crime/](http://www.met.police.uk/ro/report/ocr/af/how-to-report-a-crime/) or via the relevant website if another Police Constabulary.

### Safeguarding concerns

5. If, during the course of our work, the BPC becomes aware that a vulnerable individual has been harmed or is at risk of potential harm, the BPC will consider whether to contact the relevant Local Authority and provide the Social Services department with a copy of the relevant information.
6. When considering whether to contact the Local Authority and make a disclosure, the BPC will consider the information within their possession, the rights of the parties concerned; in particular, the disclosure of any personal or confidential information and whether a General Data Protection Regulation (GDPR) exemption applies, and the need to protect the individual concerned. The BPC will also consider the public interest.
7. The Chief Executive Officer will be consulted at the first instance prior to any disclosure(s) being made.

8. In addition, the BPC would normally also consult with a clinician on the Board of Trustees or a member of staff who is clinically trained for their opinion and insight.
9. The BPC will be mindful not to 'tip off' the relevant individual who is the alleged perpetrator of the harm caused to the victim.
10. Where a disclosure is required, the BPC will contact the relevant Social Services department of the Local Authority whose care the victim is under, where known. The BPC will locate the relevant Local Authority's contact details online.

### **Accredited registers/statutory regulators**

11. Where the BPC receives a complaint or concern regarding a non-BPC registrant who is a registrant of another regulator or, where the BPC becomes aware of concerning conduct exhibited by a non-BPC Registrant during the course of an investigation who is a registrant of another regulator, the BPC will either:
  - a. Refer the information to the relevant regulator directly; or
  - b. Notify the patient that they should redirect their complaint to another regulator and provide the details of said regulator;
12. Whether the BPC or patient refers the complaint or concern to the relevant regulator will depend on:
  - a. The patient or third party's wishes;
  - b. Whether the patient or third party are vulnerable;
  - c. Any circumstances preventing the patient or third party from making a disclosure;
  - d. Any public interest considerations
13. Where a Registrant is dual qualified, the BPC will notify the other regulator(s) of any Fitness to Practise outcomes once known and send them the relevant link, as and where appropriate.
14. The BPC will notify the accredited registers of the BPC's Fitness to Practise decisions periodically.

**December 2021**