

Association for Christian Counselling (Singapore)
Addendum to the Code of Ethics 2020
Ethical Procedures 2025

Developed by the ACCS Ethics Sub-committee members:
Ms Abigail Lee, Mr Adrian Ow, Dr Angeline Teoh, Dr Donna Lim,
Dr Gloria Kong, Mr Jacob Ng, and Ms Vania Teo.

Vetted and approved by ACCS Executive Committee (2024-2026).

Acknowledgements

The Ethics Sub-committee of the Association for Christian Counselling (Singapore) (ACCS) consulted the Singapore Association for Counselling's (2015) *Ethics Manual of Procedures*, the American Association of Christian Counselors' "Procedural Rules" (2014, pp. 54-65), and legal practitioner Mr Gregory Vijayendran, in the production of this addendum to ACCS Code of Ethics 2020.

Applicability of the ACCS Code

The ACCS Code may inform and enlighten all members, regardless of their level of counselling training, but is not strictly enforceable apart from its voluntary acceptance and integration into counselling-related work. Ethics, as explained in the Code, are founded on principles of virtue ethics which guide members in their professional and ministry behaviour. Laws, on the other hand, such as the Statutes of Singapore can be viewed as codified ethics, which the state deems necessary for regulating behaviour through attaching civil and criminal penalties.

Purpose of ACCS Ethical Procedures

The ACCS adopts the procedures as stipulated in this document to provide accurate assessment, due process and resolution of ethical cases against its duly paid-up members. These procedures evidence to the church, related professions, members of the local community, and clients who are provided with care, that the ACCS:

- a) is committed to upholding high standards of counselling practice as detailed in their Code of Ethics;
- b) recognises public awareness and acceptance of Christian counselling in the community is dependent on members' high standards of counselling practice; and
- c) takes a serious stance about protecting members' ministries and reputations by honouring their right to the Ethical Procedures (EP) process in response to complaints; hence, the ACCS assumes members' innocence until proven otherwise in each case.

In any action under these procedural rules and in the resolution of any problems in rule interpretation, the ACCS shall consider their Code of Ethics, the mandates of Scripture and the Laws of the Republic of Singapore.

Parties Involved in ACCS Ethical Procedures

The Ethical Procedures (EP) involve three main parties:

- a) ACCS Member or Member (AM) whose responsibilities are detailed in EP-A;
- b) Ethics Board (EB) whose responsibilities are detailed in EP-B; and
- c) Case Submitter (CS) whose responsibilities are detailed in EP-C.

The AM, EB and CS are subject to the jurisdiction of Singapore, including members of non-Singaporean nationality. The ACCS Executive Committee (Exco) may escalate a case to the appropriate authorities that the EB deems involves legal breaches. Upon proving and confirming the AM's ethical violation(s), ACCS also reserves the right to inform other professional organisation(s) where the AM is registered and/or the AM's place of practice and announce on ACCS's website that the AM has been removed from membership.

The EP is designed with the goal of arriving at constructive outcomes without needing further escalation, failing which every party is expected to notify the other relevant party or parties upon deciding to take legal action or to alert the authorities. Legal actions undertaken by the AM or CS are outside the purview of the EB and ACCS Exco.

EP-A: The EP may apply to current and former ACCS Members up to one year from the date of ceasing membership.

EP-A.1: Decision Point for ACCS Member (AM) at the Initial Outcome

EP-A.1.a Commencement of Mediation

Upon being informed of the case submission, AM is expected to take part in the mediation initiated and chaired by the Ethics Board (EB).

EP-A.1.b. Outcome of Mediation

If the mediation is successful between the AM and CS, the case is resolved and closed. If the mediation is unsuccessful, the EP process begins (see EP-A.2 onward).

EP-A.2: Decision Point for ACCS Member (AM) at the Midterm Outcome

EP-A.2.a. Commencement of EP Process

AM may respond in the following ways to EB's assessment and action(s):

EB's Assessment and/or Action(s) by ACCS Exco	AM's Response Options
i. Commences the EP process by addressing query letter to AM.	a. Either respond to EB's query as comprehensively as is required; or b. Inform EB and ACCS Exco of decision to take legal action*.
ii. Closes the case due to invalid or insufficient evidence to continue the EP process.	c. Acknowledge EB's decision to close the case.
iii. Ends the EP process and alerts relevant authorities.	d. Acknowledge EB's ending the EP process due to the decision of reporting to relevant authorities.

*Legal actions undertaken by the AM or CS are outside the purview of the EB and the ACCS Exco.

EP-A.3: Decision Point for ACCS Member (AM) Past the Midterm

EP-A.3.a. Response to EB's Decision and/or Recommendations

AM may respond in the following ways to EB's assessment and action(s):

EB's Assessment and/or Action(s) by ACCS Exco	AM's Response Options
i. Makes decision and/or recommendations for one or both parties.	a. Acknowledge full acceptance of EB's decision and/or recommendations; or b. Respond directly to ACCS Exco with substantiated reasons for rejecting EB's decision and recommendations; or c. Inform EB and ACCS Exco of decision to take legal action*.
ii. Closes the case due to invalid or insufficient evidence to continue the EP process.	d. Acknowledge EB's decision to close the case.
iii. Ends the EP process and alerts relevant authorities.	e. Acknowledge EB's ending the EP process due to the decision of reporting to relevant authorities.

*Legal actions undertaken by the AM or CS are outside the purview of the EB and the ACCS Exco.

--- End of Section Involving ACCS Member (AM) ---

EP-B: The Ethics Board may activate the EP process in which AMs' membership with ACCS is current or has ceased for up to one year only.

EP-B.1: Influence and Operation of the ACCS Ethics Board (EB)

EP-B.1.a. Composition of the EB

The Ethics Board (EB) is separately appointed and approved by the ACCS Executive Committee (Exco).

- i. It shall consist of a Chairperson and two members or more, subject to the prevailing needs of ACCS.
- ii. The term of the EB shall be for 2 years, and its members may be reappointed for successive terms.
- iii. Members of the EB can be current active members of ACCS or non-members of ACCS who are deemed to have experience and/or expertise in this area.
- iv. There shall be no more than one ACCS Exco member on the EB.
- v. The EB's authority is independent of ACCS's Exco.
- vi. Where a perceived or factual conflict of interest is identified between a member of EB and the ACCS member (AM) or the Case Submitter (CS), the EB member will have to be recused from the EP process.

EP-B.1.b. Mission of EB

The mission of the EB is to support ACCS in its objectives of positioning and profiling the Christian counselling profession in Singapore. This mission involves protecting clients and society-at-large from unethical conduct, reviewing ACCS's Code of Ethics periodically, interpreting and advocating the Code to members, the body of Christ in Singapore, and to the public. To this end, the EB operates according to two guiding principles:

- i. To be Christ-honouring toward all parties involved in an ethics case, seeking an objective yet restorative approach in every communication possible.
- ii. When potential Case Submitters (CS) make their cases known but do not wish to go through the EP process, an EB member will bridge crucial inhibitive gaps for the CS (and/or affected clients where applicable) from *before* their case submission and through case resolution if they choose to submit an ethics case, recognising that:
 - a. There is an "inherent power imbalance in helping relationships" (ACCS Code of Ethics 2020, A.5., p. 4) which requires EB's sensitive response.
 - b. Any distress resulting from possible ethical violations – whether perceived or factual and whether intentional or not – would benefit from stabilisation before case submission and throughout the EP process.
 - c. Psychoeducation about the EP process or how whistleblowing policies work, broadens potential CS and/or clients' options beyond remaining silent.

EP-B.1.c. Authority of EB

The EB that the ACCS Exco designates is authorised as follows:

- i. To adopt rules and procedures, as needed, to govern the conduct of every party involved in the EP process;
- ii. To carry out mediation between the ACCS Member (AM) and Case Submitter (CS);

- iii. To submit to Exco, findings and recommendations including but not limited to:
 - a. The process and outcome of mediation between AM and CS.
 - b. The need to educate and communicate about ethical standards for Christian counselling.
 - c. Responding to AM's and CS's decisions.
 - d. Taking disciplinary action.
 - e. Alerting authorities as legal violations are outside the scope of the EB's and ACCS's responsibilities.
 - f. Seeking legal consultation.

The Chairperson of the EB is responsible for overseeing the EB and for reporting back to the ACCS Exco on developments throughout the Ethical Procedures (EP) process. The Exco, in turn, deliberates over the EB's findings and recommendations before deciding the next steps, taking actions where applicable and communicating with relevant parties.

EP-B.1.d. Operation of EB

The EB shall meet at regular intervals, as needed. Conference calls can substitute for face-to-face meetings. The Chairperson and EB members must be present at every meeting. Upon accepting a case submission, the EB will observe key procedures:

- i. Aim for case resolution before administration of the annual membership dues begins. If case resolution is not possible before then, the EB shall inform the ACCS Exco about their projected timeline for reaching case resolution.
- ii. Communicate with each relevant party within two weeks of:
 - a. Receiving a case submission; or
 - b. Accepting an ethics case.
- iii. Ensure proper documentation of the following:
 - a. Audio recording(s), a signed agreement between all parties if mediation was successful, and a summary report from every mediation session.
 - b. Communication between all parties concerned
 - c. Submissions by the AM and CS, including evidence relevant to the Ethical Procedures (EP) process.
 - d. All documentation will be securely stored from the date of case submission until the time for deletion and proper disposal, per prevailing practice as informed by Singapore's Personal Data Protection Act.
- iv. Verify validity and substantiveness of submitted evidence by the CS and AM.

EP-B.2: Decision Point for Ethics Board (EB) at the Initial Outcome

EP-B.2.a. General Orientation to Upholding of Ethics

The EB shall not uncritically accept any submission of an ethics case by a Case Submitter (CS) against an ACCS member (AM), reserving the right to return invalid or incomplete case submissions, and to close an ethics case due to the submitted evidence being contradicting, frivolous, vexatious, and/or unsupportable.

EP-B.2.b. Mediation as First Response

Upon accepting an ethics case, the EB will seek the restorative approach of mediation between the CS and AM who is being reported about.

EP-B.2.c. Right to Alert Relevant Authorities

If the EB discerns it best to involve authorities such as, but not limited to Government agencies, in order to fairly address every party's interest, EB will consult ACCS Exco who has the final say, after which both the CS and AM will be notified if a decision is made to alert the relevant authorities and to end the EP process.

EP-B.3: Decision Point for Ethics Board (EB) at the Midterm Outcome

EP-B.3.a. Commencement of the EP process

If the mediation is unsuccessful, EB could begin the Ethical Procedures (EP) process by addressing a query letter to the ACCS member (AM) and request a response by a specified deadline.

EP-B.3.b. Assessment to Close Case

If the mediation is unsuccessful and there is competing or insufficient evidence to continue with the EP process, EB will close the case and duly communicate with AM and CS.

EP-B.3.c. Right to Alert Relevant Authorities

If the mediation is unsuccessful and EB discerns it best to involve authorities such as, but not limited to Government agencies, in order to fairly address every party's interest, EB will consult ACCS Exco who has the final say, after which both the CS and AM will be notified if a decision is made to alert the relevant authorities and to end the EP process.

EP-B.4: Decision Point for Ethics Board (EB) Past the Midterm

EP-B.4.a. Recommendations Toward Case Resolution

Upon receiving the ACCS member's (AM) response to EB's query letter, EB would deliberate on actions to take and in consultation with the ACCS Exco, make recommendations for the AM and/or CS as a final step towards resolving the ethics case. The ACCS Exco and EB may or may not modify their recommendations if AM should reject EB's initial decision and recommendations, depending on the AM's substantiated reasons for rejection.

EP-B.4.b. Assessment to Close Case

Upon receiving AM's response to EB's query letter, and EB assesses there is competing or insufficient evidence to continue with the EP process, EB will close the case and duly communicate with AM and CS.

EP-B.4.c. Right to Alert Relevant Authorities

Upon receiving AM's response to EB's query letter, and EB discerns it best to involve authorities such as, but not limited to Government agencies, in order to fairly address every party's interest, EB will consult ACCS Exco who has the final say, after which both the CS and AM will be notified if a decision is made to alert the relevant authorities and to end the EP process.

--- End of Section Involving Ethics Board (EB) ---

EP-C: Case Submitters may submit a case about an ACCS Member (AM) whose membership is current or has ceased for up to one year only.

EP-C.1: Information for Case Submitter (CS) at the Start of Submission

EP-C.1.a. Acceptable Grounds for Case Submission

The Case Submitter (CS) has observed the following when submitting any case to the ACCS's Ethics Board (EB) as failing to meet any of the listed requirements could result in the submitted case being rejected or delayed for processing.

- i. CS is at least 18 years of age and can represent themselves in their case submissions.
- ii. CS can be either a member of ACCS or a member of the public receiving services (e.g., counselling, pastoral counselling, supervision) from a member of ACCS.
- iii. A CS can only represent another person receiving services from a member of ACCS if such represented person is a minor or is mentally or physically incapacitated.
- iv. The submitted case is complete with specific requirements met:
 - a. The case is about a member of ACCS breaching a specific clause in the ACCS Code of Ethics or in the Membership Agreement as set out in the ACCS Membership Application form.
 - b. CS's identity is clearly indicated instead of anonymously.
 - c. CS submits the Ethics Case via ACCS's online form.

EP-C.1.b. Ethics Case Form Submission

Every ethical procedure begins with CS submitting an ethics case via ACCS's online form.

EP-C.2: Decision Point for the Case Submitter (CS) at the Initial Outcome

EP-C.2.a Commencement of Case Submission

Upon the EB's assessment of the submitted case, CS may respond in the following ways to EB's assessment:

EB's Assessment and/or Action(s) by ACCS Exco	CS's Response Options
i. Accepts case submission.	a. Take part in mediation between the CS and ACCS Member (AM).
Rejects case submission on the grounds of:	b. Resubmit the case with either supporting evidence or complete information; or
ii. Insufficient evidence,	c. Inform EB of intent to discontinue pursuit of case; or
iii. Invalid evidence, and/or	d. Inform EB and ACCS Exco of decision to take legal
iv. Incomplete case submission	action*.
v. Ends the EP process and alerts relevant authorities.	e. Acknowledge EB's assessment of the need for reporting to the relevant authorities.

*Legal actions undertaken by the AM or CS are outside the purview of the EB and the ACCS Exco.

EP-C.2.b. Outcome of Mediation

If the mediation is successful between CS and the AM, the case is resolved and closed.

If the mediation is unsuccessful, CS shall be notified upon the EB commencing the EP process.

EP-C.3: Decision Point for the Case Submitter (CS) at the Midterm Outcome

EP-C.3.a. Commencement of EP process

CS may respond in the following ways to the midterm outcome of the EP process:

EB's Assessment and/or Action(s) by ACCS Exco	CS's Response Options
i. Addresses query letter to AM.	NIL (no action needed on CS's part)
ii. Closes case on the grounds of insufficient or invalid evidence.	a. Either inform EB of intent to discontinue pursuit of case and accept case closure; or b. Inform EB and ACCS Exco of decision to take legal action*.
iii. Ends the EP process and alerts relevant authorities.	c. Acknowledge EB's assessment of the need for involving the relevant authorities

*Legal actions undertaken by the AM or CS are outside the purview of the EB and the ACCS Exco.

EP-C.4: Decision Point for the Case Submitter (CS) Past the Midterm

EP-C.4.a. Response to EB's Decision and/or Recommendations

CS may respond in the following ways to EB's decision and/or recommendations for either one or both parties:

EB's Assessment and/or Action(s) by ACCS Exco	CS's Response Options
i. Makes decision and recommendation(s) for AM to follow up on.	a. Acknowledge decision and recommendations of EB and accept case closure; or b. Inform EB and ACCS Exco of decision to take legal action*.
ii. Ends the EP process and alerts relevant authorities.	c. Acknowledge EB's assessment of the need for reporting to the relevant authorities

*Legal actions undertaken by the AM or CS are outside the purview of the EB and the ACCS Exco.

--- End of Section Involving Case Submitter (CS) ---

Flowchart of ACCS Ethical Procedures (EP)

