

Annual review of accreditation 2020/21

British Association of Play Therapists (BAPT)

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About the British Association of Play Therapists (BAPT)

The British Association of Play Therapists (BAPT) registers:

- Play Therapists

Its work includes:

- Setting and maintaining standards of practice and conduct
- Maintaining a register of qualified professionals
- Assuring the quality of education and training
- Requiring registrants to keep their skills up to date through continuing professional development
- Handling complaints and concerns raised against registrants and issuing sanctions where appropriate.

As of November 2020, there were 386 registrants on BAPT's register.

BAPT was first accredited on 25 November 2014. This is its fifth annual review and this report covers 1 December 2019 to 1 December 2020.

Background

The Professional Standards Authority accredits registers of people working in a variety of health and social care occupations not regulated by law. To be accredited, organisations holding such registers must prove that they meet our demanding [Standards for Accredited Registers](#) (the Standards). Accreditation is reviewed every 12 months.

Accreditation can be renewed by a Moderator in cases where all Standards are evidenced to be met. A Moderator can issue Recommendations and note Achievements.

Where concerns do exist, or information is not clear, a targeted review will be initiated by a Moderator. The outcome of this review is assessed by an Accreditation Panel, who can decide to renew accreditation, renew accreditation with conditions, suspend accreditation or remove accreditation. Panels may also issue Recommendations and note Achievements.

- **Condition** – Changes that must be made within a specified timeframe to maintain accreditation
- **Recommendation** – Actions that would improve practice and benefit the operation of the register, but do not need to be completed for compliance with the Standards to be maintained. Implementation of recommendations will be reviewed at annual renewal
- **Achievement** – Areas where a register has demonstrated a positive impact on one of the four pillars of the programme; protection, choice, confidence and quality.

Outcome

Accreditation for BAPT was renewed for the period of 1 December 2020 to 1 December 2021.

Accreditation was renewed by a Moderator following a review of evidence gathered by the Accreditation team and supplied by BAPT.

The following Recommendations were issued to be implemented by the submission of annual renewal documentation:

1. BAPT should finalise its policy for how BAPT handle safeguarding concerns and provide a copy of the finished version to the Accreditation team (See Paragraphs 7.1 to 7.3)

The following report provides detail supporting the outcome.

Assessment against the Standards for Accredited Registers

Standard 1: the organisation holds a voluntary register of people in health and/or social care occupations

- 1.1 There were no significant changes reported or noted in the past year. The Authority found that this Standard continues to be met.

Standard 2: the organisation demonstrates that it is committed to protecting the public and promoting public confidence in the occupation it registers

- 2.1 There were no significant changes reported or noted in the past year. The Authority found that this Standard continues to be met.

Standard 3: risk management

- 3.1 There were no significant changes reported or noted in the past year. BAPT provided a copy of its updated risk matrix. BAPT has added seven new risks to its risk matrix including three risks related to Covid-19.
- 3.2 At last year's annual review, we issued a Recommendation that BAPT should consider adding adjunctive therapies as a specific risk to its risk matrix. BAPT added Risk 2f (Registrants use therapy models that were not part of their qualifying training (adjunctive therapies) e.g. Filial Therapy; Theraplay; Animal Assisted Play Therapy) to its risk matrix. BAPT noted that controls include adhering to BAPT's Ethical Basis for Good Practice, clinical supervision, BAPTS's Duty of Candour Policy and the use of the Professional Conduct Procedure if needed. BAPT reported that further work is planned around this risk in the next year including the production of a clinical supervisor manual as a further control.
- 3.3 BAPT reported on the actions it has taken in response to the Covid-19 pandemic. This has included supporting registrants to make the changes necessary to continue to practice including changes to how supervision is conducted, accessing training for conducting therapy remotely through teletherapy or virtual sessions and the management of sudden endings or postponements of therapy. BAPT has produced and published guidance for its registrants. BAPT has considered the impact of the pandemic on registrants CPD and supervision, these are discussed in more detail under Standard 10d. BAPT is also supporting students through its accredited courses, this is discussed more under Standard 9.
- 3.4 The Authority found that this Standard continues to be met.

Standard 4: the organisation demonstrates that it has sufficient finance to enable it to fulfil its voluntary register functions effectively including setting standards, education, registration, complaints and removal from the register

- 4.1 There were no significant changes reported or noted in the past year. As part of its due diligence, the Authority reviewed records from Companies House and found that this Standard continues to be met.

Standard 5: the organisation demonstrates that it has the capacity to inspire confidence in its ability to manage the register effectively

- 5.1 BAPT reported to the Authority that it had been subject to an external fraud incident in February 2020. In response to the fraud incident, BAPT has updated its financial procedures to ensure that the Board has tighter control over its financial processes. The Authority noted that BAPT appear to have taken necessary actions to prevent this from occurring again.
- 5.2 The Authority found that this Standard continues to be met.

Standard 6: the organisation demonstrates that there is a defined knowledge base underpinning the health and social care occupations covered by its register or, alternatively, how it is actively developing one. The organisation makes the defined knowledge base or its development explicit to the public

- 6.1 There were no significant changes reported or noted in the past year. The Authority found that this Standard continues to be met.

Standard 7: governance

- 7.1 There were no significant changes reported or noted in the past year.
- 7.2 Last year under Standard 3, we discussed BAPT's approach to safeguarding. BAPT stated that 'BAPT reported that if the Board, staff or one of its members was aware of a child being at risk they are duty bound to follow local safeguarding routes which can be accessed by any member of the public. BAPT noted that if contacted about a safeguarding concern, it would signpost to the Local Authority where the child is based. BAPT stated that 'the protection of vulnerable children and safeguarding overrides any GDPR policy and is the primary concern for BAPT.' If the concern related to a registrant BAPT would still follow the above process, but would also instigate its complaints procedure. BAPT noted that it is likely that its own procedure would need to be put on hold to await the outcome of the referral to the local authority. The Authority decided to issue a Recommendation that BAPT should consider finalising its documented procedure for how it will handle safeguarding concerns raised with it.
- 7.3 Since its previous review, BAPT has drafted its Child Protection and Safeguarding Guidelines which still needs to be finalised. The Authority noted that the guidelines appear to be directed towards its members rather than considering how BAPT as an organisation would handle safeguarding concerns raised with it. BAPT confirmed that it does not currently have a separate policy to reflect its handling of safeguarding issues. BAPT reported that it will have an action in its new Business Plan to cover the review of safeguarding management within BAPT with a proposed deadline of April 2021. BAPT noted that this would fit with its website development which will include a safeguarding statement. The Authority found that the Recommendation has been considered but decided to issue a further Recommendation: BAPT should finalise its policy for how BAPT handle safeguarding concerns and provide a copy of the finished version to the Accreditation team. (Recommendation 1)

- 7.4 BAPT reported on changes in its governance. It is in the process of identifying a new Treasurer and in the meantime one of the lay Board members with relevant experience is acting as the Interim Treasurer. BAPT reported that it has developed aims and objectives for each of its sub-committees and has started developing role descriptions for its Chairs. Examples were provided to the Authority for review. BAPT also reviewed its International Subcommittee in May 2020 and decided to replace it with a named 'International Link' who is also on the Board and who can feedback any developments or issues.
- 7.5 BAPT reported that it has carried out a full review of its website this year and is moving forward with its intention to redevelop its website in 2021. BAPT has introduced an e-newsletter which it currently sends out to members, which will be available to members of the public when BAPT's new website goes live. BAPT hope that this e-newsletter will 'further develop public awareness of Play Therapy and the professional standards BAPT maintain around the profession.' BAPT reported that it has increased its social media presence and reach this year 'raising awareness and understanding about Play Therapy and the professional standards BAPT represents.' BAPT noted that it has also used these platforms to communicate and support its members and the public around the impact of Covid-19 and to demonstrate its commitment to the Black Lives Matter movement.
- 7.6 The Authority found that this Standard continues to be met.

Standard 8: setting standards for registrants

- 8.1 There were no significant changes reported or noted in the past year.
- 8.2 BAPT reported that it has completed its Social Media Policy which was ratified by the Board in January 2020 and that it has developed guidance for its registrants during the Covid-19 pandemic.
- 8.3 At last year's annual review, the Authority considered BAPT's approach to the professional Duty of Candour. BAPT did not produce specific guidance but noted that its Ethical Basis of Good Practice covered 'honesty, integrity and professional responsibility'. The Authority noted the importance of the professional Duty of Candour to public protection but has recognised that not all registrants may be aware of it. The Authority decided to issue a Recommendation that BAPT should consider whether it should produce any guidance for its registrants to clarify what is required under the professional Duty of Candour and how this fits with BAPT's Statement of Ethics and Code of Practice.
- 8.4 BAPT reported that it has written guidance for its registrants which was ratified by the Board in September. BAPT noted that this has been incorporated into its [*Ethical Basis of Good Practice*](#). BAPT has also identified the need to develop a whistleblowing policy. This will be developed in 2021.
- 8.5 The Authority found that the Recommendation had been considered and requested that BAPT provide a copy of the finished whistleblowing policy to the Accreditation team. The Authority found that this Standard continues to be met.

Standard 9: education and training

- 9.1 There were no significant changes reported or noted in the past year.
- 9.2 BAPT reported that it has worked closely with the universities running its accredited courses this year, particularly around issues relating to Covid-19. BAPT noted there have been varying issues which it has tried to address with the overriding requirement that any changes must still meet BAPT standards. For example: in particular circumstances this has meant that some aspects of the delivery of the course and clinical placement hours have been amended and / or extended for this particular cohort to enable the students to complete the requirements of the course and in the case of their qualifying year, complete their training. BAPT has highlighted several challenges this year relating to Covid-19. One such challenge was maintaining the accreditation cycles for its courses. One of its courses was due for reaccreditation in 2020. BAPT decided to postpone all reaccreditation processes for a year to allow the Universities to manage the impact of Covid-19 and adequately prepare for their next re-accreditation.
- 9.3 The Authority found that this Standard continues to be met.

Standard 10: management of the register

- 10.1 There were no significant changes reported or noted in the past year.
- 10.2 At last year's annual review, under Standard 3, we discussed BAPT's approach to handling information about registrants spent convictions. BAPT stated 'BAPT asks its members at application and annual renewal to declare any convictions. BAPT does not differentiate between spent and unspent convictions. Any declarations of convictions would be considered on an individual basis and the action taken dependent on the type of conviction. The membership team would be responsible for assessing the declaration and would if necessary, escalate it to the Board for their consideration. BAPT stated that any convictions relating to child protection issues or safeguarding would need further consideration and would likely result in membership not being approved. BAPT reported that these types of convictions would have already been considered in depth prior to membership application as it is checked at the training stage on all BAPT accredited courses.'
- 10.3 The Authority decided to issue a Recommendation that BAPT should consider whether its approach to receiving and holding information about spent convictions is in line with the requirements of GDPR.
- 10.4 BAPT responded that 'Under GPDR, BAPT acknowledges that there is no condition which permits blanket criminal conviction checks as part of its recruitment process and so the conditions will need to be reviewed on a case-by-case basis depending on the purpose of the processing. Where a 'regulatory requirement' exists, and this includes 'requirements forming part of general accepted principles of good practice' criminal conviction checks will be undertaken with consent of Registrant and in accordance with Article 6 of GDPR.'
- 10.5 The team requested further information and BAPT responded that: 'Currently, BAPT ask applicants to confirm they do not have a criminal record, but don't

ask specifically for details of convictions on either initial application or renewal forms. BAPT also ask for sight of applicant's Disclosure and Barring Service (DBS) checks on first application which would reveal any previous convictions. If the applicant declares any conviction, either current or spent, then BAPT ask for further details. This could be via the DBS at initial application or declared at renewal. Having received details, we would then ascertain if the conviction was specifically prejudicial to interest of children. (e.g. Safeguarding offences/Sexual offences/Offences involving violence/Drugs offences involving supply).

- 10.6 BAPT does not keep any of this information, including copies of DBS, as per GDPR guidance.'
- 10.7 The Authority found that the Recommendation had been considered and that this Standard continues to be met.

Standard 11: complaints and concerns handling

- 11.1 There were no significant changes reported or noted in the past year.
- 11.2 At last year's annual review, BAPT reported that it was trying to recruit new lay members to sit on its complaints panels. This year BAPT reported that it had been successful in recruiting three lay members and is currently exploring options for on-line training.
- 11.3 The Authority found that this Standard continues to be met.

Share your experience

- 12.1 The Accreditation team did not receive any responses to the invitation to share experience and did not receive any concerns about BAPT during the accreditation year.

Impact assessment

- 13.1 There were no significant changes reported or noted in the past year.
- 13.2 BAPT reported that it has begun a more 'intensive and focused reflection on the issues raised by the Black Lives Matter movement earlier this year. BAPT recognise that the majority of its Board and membership is White British. This poses a challenge in two ways: 1) to reflect and scrutinise BAPT's white status and privilege [and] our role as a professional body which holds a register which serves the public and 2) to challenge how BAPT are (or not) representing BAME communities in the public which we serve. This will be in how we are populated at Board level and how the BAPT accredited trainings are attracting and recruiting BAME students and how the content of this training reflects these communities and the issues faced by BAME children and their families.'
- 13.3 BAPT plan to develop a working group around diversity and is committed to adding this as an agenda item to each Board meeting going forward. BAPT plan to make 'Race, Diversity and it's relation to Play Therapy Practice' its' focus for the Annual Conference in 2021.

- 13.4 BAPT reported that it does not intend to make any changes to registrant fees and has committed to continue to offer post qualifying students a reduced membership rate for their first year of practice.
- 13.5 The Authority took account of the impact of its decision.

Equality duty under the Equality Act 2010

- 14.1 The Authority had regard to its duty under the Equality Act 2010 when considering the application for renewal of accreditation.