

Accredited Registers

Condition Review: Play Therapy UK (PTUK)

30 January 2024

1. Outcome

- 1.1 The Professional Standards Authority (the PSA) reviewed Conditions of Accreditation that had been issued to Play Therapy UK (PTUK) on 13 April 2023¹. Those Conditions related to *Standard Five: Complaints and concerns about registrants* and *Standard Six: Governance*.
- 1.2 We found that PTUK had met each of the four Conditions.
- 1.3 We issued three Recommendations. They are:
 - Recommendation One:** PTUK should develop its Interim Suspension processes, clarifying the circumstances in which interim suspensions will be applied, how they will be communicated to the public, how they may be appealed, and how they will be reviewed.
 - Recommendation Two:** PTUK should ensure that the language and terms used in its complaints process and accompanying materials are consistent and clear.
 - Recommendation Three:** PTUK should make the role of the BCTIWC clear on the Corporate Governance section of its website.
- 1.4 This report discusses the actions taken by PTUK to address the Conditions, and our decision about whether the Conditions were met.

2. Background

- 2.1 We accredit registers of practitioners in unregulated health and care roles. We assess those registers against our *Standards for Accredited Registers* ('the Standards')². We monitor Accredited Registers each year to check whether there have been significant changes to key processes, or significant concerns raised, that could affect whether the Standards continue to be met.
- 2.2 Where a Register has not met a Standard, we can issue Conditions. A Condition sets out the requirements and the timeframe that a Register must meet. We may also issue Recommendations to improve practice and enhance the operation of the Register, but which are not minimum requirements.
- 2.3 PTUK's most recent assessment, completed in April 2023, resulted in the following four Conditions.:
- 2.4 **Condition One:** PTUK must conduct a review of its complaints processes and make recommendations to ensure that the process is fair, transparent, compliant with Human Rights legislation, consistent with good regulatory

¹ [ptuk-annual-review-2022-decision.pdf \(professionalstandards.org.uk\)](#)

² <https://www.professionalstandards.org.uk/what-we-do/accredited-registers/about-accredited-registers/our-standards>

practice and places public protection at its heart. This was due to be completed by 14 July 2023.

- 2.5 **Condition Two:** PTUK must provide the Authority with its plan of how it will implement any changes identified by the review, including the development of relevant materials and recruitment of suitable people to participate in any new processes. This was due to be completed by 14 August 2023.
- 2.6 **Condition Three:** Any changes identified in the plan for Condition Two should be implemented within nine months of the plan being accepted by the Authority.
- 2.7 **Condition Four:** PTUK should establish effective and transparent governance arrangements for an organisation performing a public protection role. This should cover oversight and accountability arrangements to ensure that there is effective oversight of PTUK's Board of Directors. There must be fair and transparent arrangements for appointments to PTUK's Board, and any oversight body. PTUK's response to the Authority must also demonstrate how management of the Register works in the public interest. Actions should be completed within four months of publication of this report, and where not possible within this timeframe there should be a clear plan for how they will be achieved. This was due to be completed by 14 August 2023.
- 2.8 We reviewed the following evidence in our assessment of whether the PTUK had met the Conditions:
 - PTUK's written evidence submission,
 - Updates to PTUK and affiliated bodies' websites, and
 - Information from other sources including Companies House

3. Concerns leading to the Condition

- 3.1 A Targeted Review of PTUK³ identified concerns regarding the fairness and effectiveness of its complaints procedures for both complainants and registrants. We required PTUK to revise those procedures and recommended consultation with an independent, legally qualified expert in regulatory practices.
- 3.2 We had previously set Conditions for PTUK to address issues within its governance, to assure its role in protecting the public and had found those issues were not fully resolved. We also did not think it was clear whether PTUK's oversight body, the British Council for Therapeutic Interventions With Children (BCTIWC), was clearly scrutinising all PTUK functions and managing potential conflicts of interest. We required PTUK to establish transparent governance and oversight mechanisms, including a diversified Board of Directors and clear succession plans, to enhance accountability and ensure public protection.
- 3.3 Further details can be found within our published report of the Targeted Review and Review of Conditions⁴.

³ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/guidance-documents/annual-review-process-guide.pdf?sfvrsn=e5c7220_19

⁴ <ptuk-annual-review-2022-decision.pdf> ([professionalstandards.org.uk](https://www.professionalstandards.org.uk))

4. Assessment of Condition One

- 4.1 PTUK provided its response to the Condition on 13 July 2023.
- 4.2 In response to the Condition, PTUK commissioned a law firm to review and develop its complaints process. A revised process was then launched on the PTUK register website. Our initial check of the new process assured us that the process had been reviewed in line with the requirements of the Condition.
- 4.3 We found that this Condition was met, noting that a more in-depth check of the updated complaints process would be carried out during our assessment of Condition Three.

5. Assessment of Condition Two

- 5.1 PTUK provided its response to the Condition on 20 July 2023.
- 5.2 PTUK's implementation plan set out how it would recruit all required positions within its newly published procedures, including a permanent Professional Conduct Officer and members for its Assessment, Adjudication and Appeals Panels. PTUK set out how complaints were being managed while those roles were filled. We noted that PTUK had developed its role descriptions and training for staff and complaints panels.
- 5.3 We found that this Condition was met.

6. Assessment of Condition Three

- 6.1 PTUK provided its response to the Condition on 20 July 2023. PTUK had launched its new complaints procedure at that time.
- 6.2 PTUK's new process involves an initial triage, considers potential for informal resolution, and escalation through Assessment and Professional Conduct Panels. Where PTUK finds against the registrant and following any appeal, sanctions may be issued and published on PTUK's register website. We noted lay involvement within complaints panels and separation of decision making from PTUK's Board.
- 6.3 We had previously raised concerns regarding the BCTIWC's involvement in complaints handling, which might compromise its independence when auditing complaints outcomes. The new process no longer involves the BCTIWC within the handling of complaints. We confirmed that Independent Assessors, who can review Assessment Panel decisions not to take a complaint to a Professional Conduct Hearing, were not part of the BCTIWC or PTUK's governance.
- 6.4 PTUK may issue interim suspension orders against a registrant to protect the public while the complaints process is underway⁵. We were not clear from its guidance, the threshold which PTUK would consider sufficiently serious to issue interim suspensions. We were also not sure whether there were appeal processes in place, or in the case of procedures taking longer than expected, subject to periodic review. We issued the following Recommendation:

⁵ Stage 2.3 Suspension for Serious Breach, [PTUK Complaints & Concerns Procedure](#)

- 6.5 **Recommendation One:** PTUK should develop its Interim Suspension processes, clarifying when these may be applied, how they will be communicated to the public, how they may be appealed, and how they will be reviewed.
- 6.6 We require Accredited Registers to have clear policies on publishing decisions related to complaints. These policies should specify how any practice restrictions are published and represented on register entries. We noted that PTUK's Publications Policy, as mentioned in the complaints procedure, referred to PTUK's 'Outcome of Complaints'⁶ webpage which contains this information. We considered it might not be immediately apparent to complainants, registrants, or other parties that this connection exists. To address this potential confusion, we issued the following recommendation to help all parties to better understand and follow the procedures and outcomes:
- 6.7 **Recommendation Two:** PTUK should ensure that the language and terms used in its complaints process and accompanying materials are consistent and clear.
- 6.8 We found that this Condition was met.

7. Assessment of Condition Four

- 7.1 PTUK provided its response to the Condition on 16 August 2023 and updates were provided on 20 November 2023.
- 7.2 We noted the actions PTUK had taken to develop effective and transparent governance arrangements, demonstrate oversight and accountability, and ensure fair and transparent board appointments. As of November 2023, PTUK had expanded its Board of Directors to three positions: the Chief Executive, Operations Director and Executive Director/Registrar. PTUK updated the governance structure on its website and amended its Articles of Association to reflect those changes.
- 7.3 We also noted that the BCTIWC's website was updated to accurately reflect its roles. This includes managing complaints against PTUK's Chief Executive, auditing PTUK's handling of complaints against registrants, and checking for conflicts of interest between PTUK and its training provider, the Academy of Play and Child Psychotherapy (APAC). We noted that references to the BCTIWC were included on the register and main PTUK websites but considered that its place within PTUK's governance could be made clear. We issued the following Recommendation:
- 7.4 **Recommendation Three:** PTUK should make the role of the BCTIWC clear on the Corporate Governance section of its website.
- 7.5 We found that this Condition was met.

⁶ [Complaints & Concerns Procedure - Outcomes - Play Therapy UK](#)

8. Conclusion

- 8.1 We determined that PTUK had implemented new complaints procedures that addressed the requirements of Conditions One, Two and Three. We issued two new Recommendations for further improvement of the procedures.
- 8.2 We noted the actions PTUK had taken to establish improved governance arrangements for an organisation performing a public protection role. This included a revised leadership structure, succession plans and improved oversight by an independent body. We issued one further Recommendation to assist transparency.
- 8.3 We therefore found that the four Conditions had been met.