

Accredited Registers Programme

Accreditation Panel's Decision

Application for renewal from: Association of Child Psychotherapists (ACP)
Panel meeting: 12 December 2017 (**accreditation renewed**)
Accreditation valid from: 20 November 2017 – 20 November 2018

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 twelve months.

The Accreditation Panel reviewed the accreditation of the register held by the ACP. Panel members reviewed the annual review application form, an updated risk matrix, and a summary report from the Accreditation team. The Panel had to review the ACP's compliance with the Standards and decide whether to **renew accreditation**, **renew accreditation with conditions**, **suspend accreditation** or **remove accreditation**. The Panel could make recommendations in the form of:

- **Conditions** – changes that must be made to maintain accreditation. If Conditions are not met within the timeframe specified, accreditation may be removed.
- **Instructions** – actions that would improve practice but do not affect compliance with the Standards and that the Panel requires to be implemented and be satisfied of appropriate implementation within a given timeframe
- **Learning Points** – actions that would benefit the operation of the register, the implementation of which would be verified during the annual review of accreditation.

The Panel considered the range of options available to it when making its decision.

The Panel noted the assessment carried out by the Accreditation team for the annual review included:

- Documentary review (annual review form, risk matrix and additional documentation)
- Due Diligence checks and Patient/Service User journey of the ACP website and register
- Review of call for information responses and concerns received during the year of accreditation
- Complaints handling review.

The Panel was provided with a summary report prepared by the Accreditation team. The draft summary report had been provided to the ACP prior to the meeting and its comments were incorporated into the report provided to the Panel.

There were no declarations of interest from members of the Panel. A summary of matters considered by the Panel is set out in the Annex. The summary is not intended to reflect all of the matters discussed by the Panel, but to record those that were most important in forming its decision.

Outcome

The Panel was satisfied that the ACP continued to meet the Standards for Accredited Registers. The Panel decided to **renew accreditation**. The renewed accreditation is valid from **20 November 2017 to 20 November 2018**.

Conditions, Instructions and Learning Points

The Panel provided the following **Learning Point** to be verified at the next annual review of accreditation:

1. ACP should consider how it can ensure that the public knows that clients over the age of 25 should be seen by suitably qualified practitioners on an appropriate register.

The Panel confirmed that no **Conditions** or **Instructions** would be issued as a result of the annual review of accreditation.

Annex – Accreditation Panel’s Decision – application for renewal of accreditation

Organisation:	Association of Child Psychotherapists (ACP)	
Panel meeting date:	12 December 2017	
Update on Conditions issued in the previous year		
There were no Conditions issued as part of the last annual review.		
Update on Instructions issued in the previous year		
There were no Instructions issued at the last annual review.		
Update on Learning Points issued in the previous year		
<p>At the last annual review, the Panel provided the following Learning Points to be revisited at the next annual review of accreditation:</p> <ol style="list-style-type: none"> 1. ACP to consider publishing minutes or excerpts of discussions from ACP AGM, Board and Committee meetings relevant to public protection and the public interest. <p>At the previous annual review it was noted that minutes from ACP’s meetings were published on the members-only section of its website. The Panel noted, in line with decisions for other Accredited Registers, that ACP could improve its openness and transparency by publishing minutes from meetings, or summaries of matters in the public interest or related to public protection.</p> <p>ACP advised that it now publishes a ‘Summary and Decisions’ from Board meetings on its website. Minutes from ACP’s 2017 AGM are also published.</p>		The Panel agreed that this Learning Point had been considered.
Standard 1: holds a voluntary register for people in health and/or social care occupations		

<p>There were no significant changes reported or noted since last year. ACP highlighted a slight increase of registrant numbers.</p>	<p>The Panel found this Standard was met.</p>
<p>Standard 2: committed to protecting the public and promoting public confidence</p>	
<p>ACP stated that it continues to review its registration and continuing professional development (CPD) processes to ensure it is collecting relevant information to assure registrants' fitness to practice.</p> <p>ACP became a private company limited by guarantee in 2015. ACP highlighted that it has recruited three lay non-executive directors with a broad range of skills and experience. The team checked ACP's <i>Company Rules</i> and noted that ACP must have a minimum of two lay non-executive directors. Lay and professional directors serve between two and four years. The team noted that there appears to be parity between lay and professional directors.</p> <p>ACP seeks input of Board members on papers and decisions to be made if members are unable to attend meetings. ACP stated its Chair had recently met with a lay Board member unable to attend a meeting to ensure their views on an issue were heard and represented.</p> <p>ACP highlighted engagement with organisations such as Health Education England, NHS England and the Department of Health to promote child psychotherapy. ACP's 'Treat Them Right' campaign seeks for:</p> <p><i>'all CAMHS services and other mental health professionals to have access to a range of therapeutic treatments including those provided by ACP registered child psychotherapists, so every child can benefit from their skills, expertise and experience as part a truly comprehensive system of support.'</i></p> <p>ACP had originally applied for accreditation as a cluster with the British Psychoanalytic Council (BPC). At the time of application, ACP was an unincorporated association run by its Executive (rather than by a board of directors or trustees), without lay representation at that level. The two registers had worked together to implement an external oversight panel, the <i>Independent Scrutiny and Advisory Committee (ISAAC)</i>, originally known as the Protecting the Public Committee. ISAAC is an entirely lay committee which scrutinises the</p>	<p>The Panel found this Standard was met.</p> <p>The Panel noted that scrutiny of the ACP will be carried out by its Board of non-executive directors, which includes lay members.</p>

<p>activities of both registers to ensure they are adequately protecting the public. ISAAC may make recommendations to the BPC and ACP or to other bodies as it sees fit.</p> <p>ISAAC had worked with both registers to review their policies and recommend improvements to public protection where identified. At the previous annual review, for example, the team noted that ISAAC had recommended ACP develop a pro-forma leaflet for registrants to provide to patients at the start of psychotherapy. ACP had developed guidance discussing the responsibilities of the practitioner and parents (or other responsible caregiver) and the requirements for obtaining consent at the start of treatment.</p> <p>ACP and BPC's plans to further combine functions did not eventuate and both bodies have maintained separate Accredited Registers. ACP advised that due to this, ISAAC's future has been in question and ACP has sought suitable alternative methods to provide oversight of its register functions, including lay input. ACP highlighted to the team that the '<i>ACP Board of Directors is now in place, the Directors are all registered with Companies House and the Non-Executive Directors have responsibilities for the governance of the Association and oversight of its budget, its policies and procedures</i>'. ACP stated that ISAAC has assured itself that the new Board is fulfilling its obligations. Directors of ACP committees sit on, and report to the Board, which includes lay members. The Board will provide oversight, that was previously the role of ISAAC, through the non-executive directors.</p> <p>ACP's revised structure is similar to that of other Accredited Registers, with heads of committees reporting to or sitting on the organisation's main board.</p>	
<p>Standard 3: risks</p>	
<p>There have been no significant changes reported or noted since last year. ACP has updated one organisational risk relating the legal costs resulting from complaints handling. ACP plans to introduce alternative dispute resolution (ADR) at an earlier stage in the disciplinary procedures in order to enhance the proportionality of complaints handling and reduce the likelihood complaints becoming litigious. The team noted that a position of encouraging early resolution of complaints where appropriate is in line with Standard 11b.</p>	<p>The Panel found this Standard was met</p>
<p>Standard 4: Financial sustainability</p>	

<p>There have been no significant changes reported or noted since last year. The team checked the ACP's Abbreviated Accounts for the period 25 August 2015 to 31 December 2016, available on Companies House, and noted that ACP appeared to continue to be financially sustainable.</p>	<p>The Panel found this Standard was met</p>
<p>Standard 5: capacity to inspire confidence</p>	
<p>There have been no significant changes reported or noted since last year. ACP stated that the reorganisation of its structure, reported to the team at its previous annual review '<i>has strengthened the organisation's governance processes and solidified clear lines of accountability within the organisation.</i>' ACP highlighted that it aims to communicate with registrants, and the public, in an open and thoughtful manner which was demonstrated in examples seen by the team.</p>	<p>The Panel found this Standard was met</p>
<p>Standard 6: knowledge base</p>	
<p>ACP highlighted its Scientific Development directorate, responsible for ACP's research functions, its publication of the Journal of Child Psychotherapy, and the publication of its competence framework for child and adolescent psychoanalytic psychotherapists at point of qualification from an ACP accredited training school. At the time of submission, ACP had not yet appointed its Director of Scientific Development, who will lead this section.</p> <p>ACP reported the development of its competences framework, events held, and other matters contributing to the development of its knowledge base.</p>	<p>The Panel found this Standard was met.</p>

<p>Standard 7: governance</p>	
<p>ACP highlighted its revised organisational structure, and stated that the organisation is now governed by ‘<i>a mix of child psychotherapist and lay members in executive and non-executive roles</i>’.</p> <p>ACP advised its newly elected Vice Chair would start on 1 January 2018 and new Chair on 1 April 2018.</p> <p>ACP reported that it is working to develop youth representation within the organisation through recruitment to its Operations and Liaison Committee.</p>	<p>The Panel found this Standard was met. The Panel welcomed plans to develop youth representation within the ACP.</p>
<p>Standard 8: setting standards for registrants</p>	
<p>ACP has made explicit within its Code of Professional Conduct and Ethics that it ‘<i>accredits its members on the public register to work with infants, children, adolescents (up to the age of 25) and parents (where the child is the identified patient)</i>’. The ACP highlighted that it worked with registrants to ‘<i>ensure that any affected patients had an appropriate ending or transfer of treatment</i>’ as they approached or passed that age.</p> <p>The team noted that ACP made the above amendment to its Code following a complaint made to it regarding treatment of a client over the age of 25 by a practitioner registered with ACP and other Accredited Registers. The changes would allow ACP to direct complainants, in the first instance, to registers whose practitioners work with older clients.</p> <p>The team asked how this would work in practice if, for example, a concern was raised against a dual registered ACP practitioner regarding a client over the age of 25. ACP confirmed it would ‘<i>refer the complaint to the organisation with which the member was registered to work with adults. If they had not registered with another regulator, the ACP would have powers to investigate the member for working outside their professional competence.</i>’ The ACP confirmed it would ‘<i>continue to recognise decisions regarding professional conduct made by other regulatory bodies and registers</i>’</p> <p>ACP has made Safeguarding training for practitioners working in private practice a requirement for registration and will be offering ‘Safeguarding Level 3 training’ to assist registrants’ understanding and compliance.</p>	<p>The Panel found this Standard was met.</p> <p>The Panel noted ACP’s policy decision that the most relevant organisation should manage complaints where registrants are dual registered and that it would recognise those outcomes. ACP would act when a registrant was treating clients outside their professional competence,</p> <p>The Panel noted that ACP registrants are ‘trained to work with children and young people from 0-25</p>

	<p>years' and that assistance is provided to clients turning 25.</p> <p>The Panel noted that different registers within counselling and psychotherapy may have different scopes of practise, which could raise questions about the psychotherapeutic approach applied by a dual-registered therapist, and which register is responsible for governing this.</p> <p>The Panel issued a Learning Point for the ACP to consider how it can ensure that the public knows that clients over the age of 25 should be seen by suitably qualified practitioners on an appropriate register.</p>
<p>Standard 9: education and training</p>	
<p>There have been no significant changes reported or noted since last year. ACP highlighted plans to arrange more CPD events for registrants.</p>	<p>The Panel found this Standard was met.</p>

<p>Standard 10: the register</p>	
<p>There have been no significant changes reported or noted since last year.</p> <p>The team reviewed a sample of registrants and did not identify any issues with accuracy of information presented. ACP requires its registrants to check their profile annually as part of the re-registration process.</p> <p>ACP highlighted that all registrants appear on the public register, but may choose not to appear on its Find a Therapist directory for private practitioners. Information on the Find a Therapist directory is provided to ACP's Registrar for approval before publication.</p>	<p>The Panel found this Standard was met.</p>
<p>Standard 11: complaints and concern</p>	
<p>There have been no significant changes reported or noted since last year.</p> <p>This year, the team is focusing on complaints handling both against registrants and against the organisation. The team reviewed ACP's complaints policies and spoke with its Chair and the Chair of the Ethical Practice Group, who is responsible for management of complaints and other ethical issues addressed to ACP.</p> <p>The ISAAC review of ACP's disciplinary and fitness to practice procedures highlighted good practise, for example that ACP will continue disciplinary action should the registrant resign. It also made recommendations such as implementing an 'interim suspension' mechanism, providing guidance to ACP Investigating Panels to assist their decisions, and making procedures more accessible. ACP has acted on those recommendations, for example it had drafted a simplified version of the complaints process and was developing a flow diagram of the complaints process.</p> <p>ACP highlighted that its approach to handling complaints is to seek to make complainants feel heard and recognise the reasons they are raising concerns, even if this does not progress through ACP's procedure. The team noted this in communications from the Chair of the Ethical Practice Group to complainants, which appeared proportionate and understanding. The team noted ACP's approach should assist and facilitate those wishing to raise concerns.</p>	<p>The Panel found this Standard was met.</p>

ACP provides detailed information on complaints outcomes (resulting in sanction) at:
<http://childpsychotherapy.org.uk/complaints/sanctions>.

ACP's complaints process allows its Director of Professional Standards (formerly the Registrar) to set aside and have decisions reconsidered in response to concerns raised about the decision-making.

The team reviewed examples of complaints managed by ACP that went to hearing, and cases that were found to have no case to answer at the preliminary screening stage and did not progress further.

The team queried a case where it was not clear if the Panel had considered if the allegations bring the profession into disrepute. ACP confirmed that it considers if conduct that might cause '*serious damage to the standing of the profession*' however the allegations in that case were not found to be sufficiently serious. ACP sets guidance to assist making such decisions within its annotated complaints procedure, as used by its complaints panels. ACP Panels also refer to guidance when issuing sanctions.

The team noted an example of a complaint that went to hearing three years after the complaint was made, however was dismissed by the Panel as there was insufficient evidence '*adduced by the Investigating Panel to conclude there was a prima facie case*' and that it should not have progressed. ACP advised that the case had been progressed on legal advice at that time. ACP has introduced a new protocol to consider whether such legal advice should be sought or whether forms of alternate dispute resolution should be considered when appropriate.

When reviewing this case, the team noted resources provided by the registrant that suggested treatment of 'recovered memories'. The ACP had previously confirmed its awareness of a risk that memories could be formed within the therapeutic context, of events which never happened and that it has mitigating controls in place to manage this. ACP confirmed that its scope of practice does not include working to recover false or repressed memories and such practices are not trained or condoned. ACP confirmed that other referenced conditions, for example *Dissociative Identity Disorder* is not within the scope of child psychotherapists to diagnose or treat and concerns raised would be treated as discussed in Standard 8, above.

Share your experience and concerns about the Accredited Register received in the previous year of accreditation

One concern was received regarding the outcome of a case investigated by the ACP. The team had been aware of this matter since ACP's initial application for accreditation. The team had reviewed the outcome of the complaint at the previous annual review:

'At ACP's initial application for accreditation, concerns were received from third parties in relation to 'recovered memory' treatment of a client by an ACP registrant. The client allegedly recovered memories of abuse during childhood, while undertaking therapy with the registrant (and another non-ACP practitioner). This occurred in the 1990s and the registrant was still in practise. The ACP was sent, with the sender's permission, concerns about the registrant and other materials, including a letter to an organisation and an article about the case that had been published in the Observer newspaper. The ACP stated that the Authority's contact was the first time it had been made aware of these concerns and that, after considering the material presented and seeking legal advice, had decided to treat this as a deemed (third-party) complaint under its disciplinary procedures.

The ACP recently advised that this case had now concluded and that allegations investigated had not been found proved by its Disciplinary Committee. The team requested to review anonymised copies of the Committee's decision and corresponding outcome letters to the complainant and registrant. The team considered these in line with the observation tool used during its assessment of complaints hearings. The team noted that the decision appeared to clearly describe the background of the case, the allegations to be considered, the Disciplinary Committee's remit, the final decision and the Committee's reasoning for this. The findings of the Panel appeared to be derived from evidence referred to in the decision. The report noted that while approaches to safeguarding had developed significantly since the time of the events described in the allegations, actions taken at that time did not appear to have been in breach of ACP's Codes. The team noted that the letters notifying parties referred to the decision without further comment.'

The complainant wrote that they *'disagreed with the conclusion of the ACP that [the registrant] does not have a case to answer'* and that they particularly took issue with *'the methodology employed throughout the Disciplinary Hearing'* including accepting evidence that the complainant felt had been entirely disproven. The

The Panel noted that based on the evidence before it, ACP's handling of the concerns raised did not affect its ability to comply with the Standards.

<p>team noted that while registrants may appeal against decisions of disciplinary panels, other parties may make use of the following, as discussed under Standard 11:</p> <p>13. REGISTRAR’S POWER TO SET ASIDE IN RESPONSE TO CONCERNS Availability of the Registrar’s set aside power 13.1 Certain decisions of the Ethics Committee Chair, Investigating Panel or Disciplinary Committee identified below may be set aside by the ACP’s Registrar and reconsidered in response to concerns raised by a complainant, a person who supplied information dealt with as a deemed complaint, or a complained of member.</p> <p>The team checked the evidence considered for this case as part of its complaints review for Standard 11 and noted proceedings appeared to be in line with the outcome previously seen by the team, above.</p>	
<p>Equality duty under the Equality Act 2010</p>	
<p>The Panel must consider the Authority’s equality duty under the Equality Act 2010 when considering an application for renewal of accreditation.</p>	<p>The Panel had regard to its duty under the Equality Act 2010 when considering this application for renewal of accreditation.</p>
<p>Impact Assessment</p>	
<p>There have been no significant changes reported since last year.</p>	<p>The Panel noted and took account of the impact of its decision to renew accreditation.</p>