

Accredited Registers Programme

Accreditation Panel's Decision

Application for renewal from: Association of Child Psychotherapists (ACP)
Panel meeting: 25 November 2016 (**accreditation renewed**)
Accreditation valid from: 20 November 2016 – 20 November 2017

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 ACP. Panel members reviewed the annual review application form, an updated risk matrix, ACP's query sheet responses and a summary report from the Accreditation team. The Panel had to review ACP's compliance with the Standards and decide whether or not 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 in order to gain accreditation
- **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 noted the assessment carried out by the Accreditation team for the annual review included:

- Documentary review (annual review form, query sheet response and risk matrix)
- Due Diligence checks and Patient/Service User journey
- Review of share your experience responses and concerns received during the year of accreditation.

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 ACP continued to meet the Standards for Accredited Registers. The Panel decided to **renew accreditation**. The renewed accreditation is valid from **20 November 2016 to 20 November 2017**.

Conditions, Instructions and Learning Points

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

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.

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)	Accreditation renewed
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 making the support that it will offer to those providing information and evidence in complaints and disciplinary cases explicit on its website. <p>ACP explains the advice and support it can provide for those providing information and evidence in complaints and disciplinary cases under Section 6.2 of its Disciplinary Procedure. ACP updated its website to include the offer of support posted to the complaints section. The website also provides links to the full disciplinary procedure and guidance on 'What happens at a Disciplinary Committee Hearing'.</p> <ol style="list-style-type: none"> 2. ACP to consider how it could provide clear information to the public about registrant categories, statuses and any sanctions in place. <p>At the previous annual review, the Panel considered that there was scope for confusion as to how information was presented on ACP’s register webpage. The Panel noted that ACP’s objective should be that a member of the public visiting the register webpage should be able to make an informed decision using information provided. The Panel noted that ACP publishes information on trainees and other categories of registration but it could also advise that registrants may belong to statutory regulators or other bodies and direct to its Useful</p>	<p>The Panel noted the actions taken by ACP in response to the Learning Points and agreed that they had been considered.</p>

<p>Links page. ACP could also provide descriptors for the status of registrants, such as 'pending' or 'active' as it had done for categories of registration. ACP updated its website, using the * marker for registrants with sanctions. This is explained and links to the sanctions page provided.</p> <p>3. ACP to consider developing mechanisms for managing risks to the public and registration while complaints investigations are ongoing.</p> <p>ACP stated it is '<i>actively considering whether it needs to introduce interim sanctions or suspension if there is credible evidence of gross misconduct</i>'. ACP estimates that this will be completed by April 2017.</p> <p>ACP stated that at present the '<i>Registrar has the authority to remove a member from the Find a Therapist section of the website if they feel that the nature of the breach of the Code of Ethics is such that members of the public may be at risk.</i>'</p>	
<p>Standard 1: holds a voluntary register for people in health and/or social care occupations</p>	
<p>There have been no significant changes reported or noted since last year.</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 is going through a restructure in order to accommodate the change to a private company limited by guarantee made in August 2015. ACP confirmed that it continues to focus on public protection, and explains that its 'Professional Standards directorate', is now responsible for registration, ethics and complaints. ACP highlighted that its Director of Professional Standards (the Registrar) will ensure that lessons learned from complaints will inform developments to its standards. ACP also plans to recruit lay non-executive directors whose role will assure continuing public protection.</p>	<p>The Panel found this Standard was met.</p>

Standard 3: risks	
<p>ACP stated that risks are considered at its Executive Committee meetings and following the completion of ACP's restructure, will also be considered by the new Board.</p> <p>ACP reviewed and updated the risk matrix with new risks for this annual review. When reviewing the risk matrix, the team noted that many of the listed risks were static, or increasing, despite mitigating actions. The team asked ACP for further information about the increasing risks and whether additional controls have been considered to mitigate these increases. ACP responded that child psychotherapists work in the NHS and public sector, which undergo cuts and changes outside the ACP's control; that the nature of ACP's clients and work means that risks will remain static or increase; and that some risks are 'owned' by the employer and not the registrant. ACP confirmed the actions it takes to mitigate risks that may occur in registrants' practice. ACP also highlighted that it considers the range of risks that registrants face in practice, including but not limited to those identified through complaints.</p>	<p>The Panel found this Standard was met. The Panel noted ACP's explanation of static and increasing risks and the mitigations in place.</p>
Standard 4: Financial sustainability	
<p>At the previous annual review, the team noted on Companies House that ACP was registered as a private company limited by guarantee on 25 August 2015. Their first annual return and accounts will be due in 2016 and 2017 respectively. For this review the team checked Companies House which states that ACP's first accounts to 31 August 2016 are due by 25 May 2017. The team checked the accounts for the year ended 31 December 2015 provided by ACP and noted that ACP appears to continue to be financially sustainable.</p>	<p>The Panel found this Standard was met.</p>
Standard 5: capacity to inspire confidence	
<p>There have been no significant changes reported or noted since last year.</p> <p>ACP highlighted that it has added a second administrator to its staff team to respond to member and public enquiries.</p> <p>As part of its review of Standard 5 the team checks organisations' transparency or openness. The team noted that minutes from ACP's AGM and other committee meetings are published on the members-only section of the</p>	<p>The Panel found this Standard was met. The Panel issued the following Learning Point: ACP to consider publishing minutes or excerpts of discussions</p>

<p>ACP website. In response to Learning Point 1, ACP stated it will consider if it is appropriate to publish any of its minutes.</p>	<p>from ACP AGM, Board and Committee meetings relevant to public protection and the public interest.</p>
<p>Standard 6: knowledge base</p>	
<p>During its initial assessment ACP stated it would be investigating Short-Term Psychoanalytic Psychotherapy (STPP). ACP reported that an STPP Manual ('Short-term Psychoanalytic Psychotherapy for Adolescents with Depression: A Treatment Manual') written by ACP registrants, will be launched shortly. ACP advised <i>'the ACP STPP Implementation group is actively exploring how to support child and adolescent psychotherapists with developing this work in their clinical settings and with communicating the results to clinical commissioners and NICE. An STPP event on adolescent depression is being planned for Autumn 2017.'</i></p> <p>ACP highlighted work that is being undertaken to develop its knowledge base. For example, an article published in the October 2016 <i>ACP Bulletin</i> highlighting current PhD research on "Psychodynamic models of working with looked after children with histories of trauma or maltreatment."</p>	<p>The Panel found this Standard was met.</p>
<p>Standard 7: governance</p>	
<p>ACP reported that it is transitioning to a new structure. ACP aims for this to be in place by January 2017. Until this is in place, ACP's current Executive Committee continues to manage the register and other functions. ACP's new Board of Directors will include three or four Non-Executive Directors (Lay Members). The team checked the job description and noted that responsibilities include <i>'to assist the Board of Directors in its duty of public protection and oversight of the register'</i>. Roles may include <i>'helping to ensure the protection of the child remains central to the activities of the ACP and its registered members and that ACP fulfils its duties of public protection'</i>.</p> <p>ACP's terms of appointment state that Non-Executive Directors will, following appointment by the Board, have parity with Executive Directors. The team checked previous decisions by the Panel which had stated that lack of parity between professional and lay directors, such as length of appointment, could impact on the performance and continuity of a Board. The ACP confirmed that while Non-Executive Directors will be</p>	<p>The Panel found this Standard was met.</p>

<p>appointed for three year terms, Executive Directors will be able to serve between two to four year terms to a maximum of six years. The team did not consider this suggested a lack of parity.</p> <p>ACP highlighted work undertaken by its oversight body, the Independent Scrutiny and Advisory Committee (ISAAC) over the past year. ISAAC also scrutinises the British Psychoanalytic Council (BPC) ISAAC's report notes that from <i>'the period 2013 – 2015 ISAAC enjoyed a more active involvement with the BPC, but since the beginning of 2015 this changed and the Committee is now fully and equally engaged with both constituent organisations'</i>. ISAAC's report notes that ACP's Chair has attended every Committee meeting <i>'to take any areas for learning and refinement back into the ACP.'</i> The team noted that ISAAC recommended that ACP revisits its current policy on disclosure and barring to ensure that it is fit for purpose and report back to the Committee when this is completed. The team noted the ISAAC also observed an ACP training provider accreditation, as detailed under Standard 9.</p> <p>ACP highlighted its ongoing participation in the We Need to Talk Coalition and the development of its website. ACP has published advice leaflets, for example a support leaflet for parents/carers of infants between the ages of 0-3 years old who have been diagnosed with cancer. ACP's leaflet explaining the roles of ACP and Child Psychotherapy also highlights its Accreditation by the Authority.</p>	
<p>Standard 8: setting standards for registrants</p>	
<p>ISAAC's Recommendations on information provided to patients (by psychotherapists) (October 2015) report suggested that ACP could develop a pro-forma leaflet for registrants to provide to patients at the start of psychotherapy. The team asked if ACP had produced this. ACP responded that after discussion with its Independent Practice Committee, which advises registrants and provides guidance about aspects of independent practice, it decided to provide guidelines for registrants, including what is essential, advised and optional. ACP supplied a copy of the guidelines (adopted May 2016) which were checked by the team. The guidance discusses the responsibilities of the practitioner and parents (or other responsible caregiver) and the requirements for obtaining consent at the start of treatment. The guidance states that <i>'Consent does not necessarily have to be obtained in writing from the patient but, if obtained verbally, must be noted in the case notes'</i>, emphasising that ACP strongly recommends against reliance on implied consent. The guidance provides items that must be communicated to the caregiver (whether in writing or verbally) including details of treatment, charges, how therapy duration will be agreed / how the ending will be managed, duties of confidentiality and when information may be shared.</p>	<p>The Panel found this Standard was met. The Panel discussed ACP's approach to consent. The Panel noted ACP's guidance and the information published within ACP's ethical framework.</p> <p>The Panel received further information from the team about ACP's approach to consent for sharing</p>

	information for research purposes. The Panel considered this information and was content with the guidance produced by ACP.
Standard 9: education and training	
<p>ACP is developing core competencies for child psychotherapy and also provided a workshop on measurement of outcomes.</p> <p>The team checked ISAAC's report on its observation of a training provider's re-accreditation. The ISAAC team were generally complementary about the effectiveness and rigour of the ACP accreditation team, as with the quality of the training provider. Learning points and suggestions for future accreditations were made.</p> <p>The team checked the published report and noted that all ACP standards were found to be met, while noting that increasing external pressures are being suitably managed by the provider. The ACP accreditation team provide commendations for good practice and recommendations for improvements.</p> <p>ACP was required for this Annual Review to include demonstration of compliance with Standard 9e:</p> <p><i>9e) Makes its education and training standards explicit and easily accessible to the public to enable all those using the register to make informed decisions</i></p> <p>The new Standard was implemented following the Authority's consultation on the recommendations from the education and training review for the Accredited Registers programme. Standard 9e requires Accredited Registers to make their education and training standards explicit and accessible to the public. The assessment of this additional Standard started in April 2016 for both new applicants and existing Accredited Registers submitting their annual review of accreditation.</p> <p>ACP's annual review form directs to its How to Train page for potential registrant practitioners. It lists:</p> <ul style="list-style-type: none"> • pre-training requirements (including enhanced Disclosure and Barring Service check, required qualifications and work experience) 	The Panel found this Standard was met.

- details of clinical training (including psychoanalytic theories, research methodology and practice and child protection procedures)
- details of required clinical work under supervision
- the context of work with children, adolescents and their families, including adult mental health experience, working in the NHS, multi-agency working
- requirements for personal analysis

The similar [Training](#) page also provides information on accredited training schools, pre-clinical training courses and information on their accreditation, including providers' most recent reports.

ACP's [Member Register](#) page provides descriptions on the Trainee Member and Full Member categories of registration. It states that Full members will have completed training and work as a Child and Adolescent Psychotherapist. The Trainee descriptor links to the How to Train page linked above.

ACP's [Find a Therapist](#) page highlights that '*All ACP registered Child and Adolescent Psychotherapists have undertaken a minimum of six years' training, of which four years is in psychoanalytic practice in the NHS.*'

The team suggested to ACP that the training pathway to become a child psychotherapist, as described by ACP is clear, but there could be a clearer link to ACP's required training standards for entry to its register. The team suggested ACP may wish to consider how it could highlight the relationship between practitioners' qualifications and competencies and requirements for entry to its register. The team also suggested highlighting ACP's requirement for doctorate or equivalent level qualifications and that publishing information about core competencies, when available, will also assist to inform the public. ACP responded that the training sections of the website are currently under review and these comments will be fed in to this process.

Standard 10: the register

ACP highlighted changes to the administration of its register. The team noted that the changes in terminology used will assist the public to better understand registrants' statuses.

The team checked examples of ACP's 'Find a Therapist' tool which allows people to search for registrants who are eligible and available to work in private practice. The tool highlights that it is not a full list of registrants and links to the register web page. Register entries provide information such as name, membership number,

The Panel found this Standard was met.

<p>address and contact details, languages, fees and personal statements. ACP confirmed that this information is manually submitted to, and verified by, ACP staff.</p> <p>ACP provided a copy of its report on its 2014/5 audit of registrants, noting that the standard of Continuing Professional Development (CPD) remained high and that in return, the audit assisted ACP to identify and contribute relevant CPD resources for its registrants. The 32 registrants audited included practitioners working in the NHS and private practice, and also those who were registered recently and those registered for ten years or more. The report did not appear to identify serious issues to be addressed, and highlighted areas that could be further explored such as the role of supervision in supporting and developing clinicians' work.</p>	
<p>Standard 11: complaints and concerns</p>	
<p>Previous decisions by the Panel have stated that a complainant should be able to complain to a register if they feel their complaint has not been properly handled. As part of its assessment the team asked if the ACP Disciplinary Process allows for a complainant to formally appeal a decision or petition the ACP to appeal on their behalf. ACP responded:</p> <p><i>'The ACP Disciplinary Process does not currently allow for a complainant to appeal a decision or petition the ACP to appeal on their behalf. The latter would effectively mean that the ACP would be petitioning itself. The ACP may need to consider whether it might allow a complainant to complain about how the ACP has handled the complaint and it might then need to appoint a third party to investigate this. This has cost implications for the ACP which is a very small organisation with limited funds and there is a risk of vexatious complaints were this to be introduced. This issue will be put on the agenda of the Ethics Committee and the new Board of Directors for further thought.'</i></p> <p>ACP highlighted that it is developing processes for when a complaint about a Training School can be raised with the ACP Training Council. The team checked the draft policy provided. Upheld complaints will result in one or more conditions that the training school must implement over an agreed timescale. All parties will be able to provide feedback at the conclusion of its process.</p> <p>The team was not able to observe an ACP disciplinary hearing during the initial assessment but received consent from involved parties to attend a hearing in April 2016. The registrant was alleged to have engaged in unacceptable behaviour against their line manager and other colleagues. ACP considered this as a possible breach of its codes under <i>'conduct that might cause serious damage to the standing of the profession'</i>.</p>	<p>The Panel found this Standard was met. The Panel discussed ACP's processes for appeal and noted that a complainant could also use the process for complaining about the organisation.</p>

<p>The team noted that the hearing appeared to have been held in line with ACP’s Disciplinary Procedure. The Chair, Panel members and participating Investigation Panel members appeared to contribute appropriately and allowed for questions and comments by the registrant. The team noted that the Panel considered whether alternate means of managing the concerns raised might have been appropriate.</p> <p>Following the meeting the team checked the anonymised meeting minutes, Panel’s decision and sanctions issued. The team noted a summary of the decision was posted on the sanctions page of the ACP website.</p> <p>The decision of that Panel, posted in June 2016, was for the registrant to undertake professional supervision for a minimum of one year. The ACP decisions page stated that as of September 2016 the practitioner was no longer a registered member of the ACP and the team noted that the former-registrant was not listed on ACP’s Register, Expelled Members or Former ACP Members pages. The team asked ACP to confirm what actions were taken from the point of sanction, to removal from the register. ACP confirmed that registrants can resign or lapse their registration after the completion of the disciplinary procedures, as happened in this case. ACP highlighted that the sanction imposed will remain on the public website for the time specified. ACP provided anonymised copies of correspondence from the Registrar to the practitioner confirming their removal from the register, sanctions currently in place and advised this information would be relayed to the practitioner’s employer as per ACP policy.</p> <p>ACP’s Former Members page states that it has ‘<i>names of former ACP members – no longer registered with the ACP in 2015</i>’ and ACP advised that this page lists former members upon their resignation unless members request not to appear. ACP confirmed former registrants will be added here unless they request not to be.</p>	
<p>Share your experience and concerns about the Accredited Register received in the previous year of accreditation</p>	
<p>The Accreditation team received one acknowledgement to the share your experience process, which made no comment about ACP’s compliance with the Standards.</p> <p>The team received one concern about ACP during the accreditation period, regarding a former student’s dispute with an ACP training provider. The team noted that the events described occurred prior to ACP’s accreditation. ACP’s processes for complaints about Training Schools are described above.</p>	<p>The Panel noted that ACP’s handling of concerns raised did not appear to affect its ability to comply with the standards</p>

Equality duty under the Equality Act 2010	
The Panel must consider the Authority's equality duty under the Equality Act 2010 when considering an application for renewal of accreditation.	The Panel had regard to its duty under the Equality Act 2010 when considering this application for renewal of accreditation.
Impact Assessment	
There have been no significant changes reported since last year.	The Panel noted and took account of the impact of its decision to renew accreditation