

Annual review of accreditation 2021/22

Play Therapy UK (PTUK)

September 2021

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About Play Therapy UK (PTUK)

Play Therapy UK (PTUK) registers:

- Certified Play Therapists
- Accredited Play Therapists
- Certified Practitioners in Therapeutic Play Skills
- Certified Play and Creative Arts Counsellors of Children and Young People
- Filial Play Coaches
- Certified Supervisors of Play and Creative Arts Therapists

Its work includes:

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

As of 30 January 2021, there were 2664 registrants on PTUK's register.

PTUK was accredited on 11 April 2013. This is PTUK's seventh annual review, and this report covers 11 April 2020 to 11 April 2021.

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.

- **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

Outcome

Accreditation for PTUK was renewed with Conditions of Accreditation for the period of 11 April 2021 to 11 April 2022.

Accreditation was renewed by a Panel following a targeted review to look at Standards 2, 4, 5, 7, 9 and 11 in greater depth.

The following Conditions must be met within one year of the publication of this report:

- **Condition One:** Develop contingency plans for the continued operations and leadership of PTUK should the current Chief Executive leave their role. These should include how PTUK will ensure that persons named in the succession plan are equipped for the role of Chief Executive. (paragraph 7.13)
- **Condition Two:** Strengthen arrangements for the governance and oversight of leadership decisions affecting PTUK. This could include: expanding the Board of Directors so there is more than one Director; setting out clear delegation of responsibilities and decisions to the Senior Management Team within PTUK's frameworks; enhancing the powers of non-shareholding members at the AGM; and strengthening the independence and robustness of the BCTIWC's oversight of PTUK. (paragraph 7.13)
- **Condition Three:** Publish clear details of the relationship between PTUK, APAC and the BCTIWC so that it is clear to the public who has ultimate responsibility for key functions and how to raise a concern about any aspect of their work. (paragraph 7.13)

We also issued the following recommendation aimed at best practice:

- **Recommendation 1:** PTUK should identify groups who have a clear interest in its policies and processes and ensure that there are mechanisms to consult and take account of their feedback. (paragraph 7.15)

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 PTUK reported an increase in the number of registrants since its previous annual review, from 2334 to 2664
- 1.2 We found that this Standard continued 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 PTUK operates as a governing body and professional play therapy association, promoting the interests of play therapy and its membership. PTUK's Register of Play and Creative Arts Therapists allows the public to search for practitioners that meet its standards for safe and effective practice. PTUK's Director and staff also operate the Academy of Play and Child Psychotherapy (APAC), a training provider providing qualifications conferring eligibility to join PTUK's register, and Play Therapy International (PTI), which aims to develop and support the practice of play therapy in other countries.
- 2.2 When first accredited, PTUK was overseen by two Directors, with supporting staff. We had previously noted that PTUK's accreditation of APAC clinical standards raised a potential conflict of interest that might impact on PTUK's ability to inspire confidence in the occupations it registers. That conflict was mitigated through separation of PTUK's Chief Executive and Registrar roles, and the establishment of the British Council for Therapeutic Interventions with Children (BCTIWC) as an independent body responsible for oversight and scrutiny of PTUK.
- 2.3 One of PTUK's two Directors (who was also PTUK's Registrar), Jeff Thomas, died in July 2020. PTUK recognised the Director's 22 years' contribution to the development of play therapy and to its register, and the significant amount of work they had performed voluntarily.
- 2.4 PTUK had since developed its Professional Practice and Career Management Team (PTUK's Senior Management Team) to carry on that work and assure PTUK's long-term sustainability. PTUK reported it had updated its website and implemented a new database and accounting system. During the period under review it has also taken actions in response to the Covid-19 pandemic, including temporary suspension of APAC-led training worldwide.
- 2.5 We noted that following the death of the Jeff Thomas, PTUK's Chief Executive and sole remaining Director had temporarily taken over the additional role of Registrar while developing the Senior Management Team. During our review we considered whether the Chief Executive's multiple responsibilities could compromise the 'firewall' between PTUK's professional membership interests, and regulatory functions.
- 2.6 We carried out a Targeted Review to look in greater depth at how the current arrangements for management and oversight of PTUK affected the

Standards. We found that the current arrangements do not allow for effective challenge and scrutiny of decision-making. It is important this is addressed to give confidence that PTUK prioritises public protection over other interests. The Conditions set out at Standard 7 therefore also affect Standard 2.

- 2.7 This Standard continues to be met subject to the Conditions set in Standard 7.

Standard 3: risk management

- 3.1 The Authority had previously considered Accredited Registers' approaches to safeguarding issues; how registers are prepared to protect children, young and vulnerable people from abuse and neglect. As a Register for practitioners working with children and young people, PTUK's risk management practices are focussed on risks that may occur when treating these groups. The Authority had noted PTUK's requirements and guidance for registrants: it raised awareness of safeguarding matters through its 'Play for Life' journal and 'Good to Know' e-newsletter.
- 3.2 At the previous annual review, we sought to better understand the actions PTUK would take if it identified a safeguarding concern. We issued a Recommendation for PTUK to review its safeguarding process to ensure that it is integrated effectively with the roles and responsibilities of other authorities especially the local authority, police and schools.
- 3.3 In April 2021 PTUK published its Safeguarding Policy. We noted that this policy states 'where an allegation is made against a PTUK member who works with children or young people, PTUK being an awarding body and not an employer will consult with appropriate LADOs (Local Authority Designated Officers) for advice'.
- 3.4 We consider that the previous Recommendation has been considered. 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 PTUK has not increased its registration fees over the past year.
- 4.2 PTUK has recently employed paid staff for roles that were previously performed voluntarily. PTUK advised it held reserves for unexpected events such as the Covid-19 pandemic. These reserves had been drawn upon when PTUK operated at a reduced income through the pandemic, due to temporarily pausing some of its income-generating activities. However, its financial position has since been strengthened by the increases in membership and it has assured us that it is building up its reserves again.
- 4.3 As part of our review, we checked records from Companies House and that PTUK has appropriate business insurance policies in place.
- 4.4 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 PTUK provided its [Equality and Diversity Policy](#) which states ‘PTUK believes that every person has the right to live a life free from discrimination, harassment, bullying and disadvantage regardless of their age, disability, gender or gender choice, pregnancy and parental responsibilities, race, relationship status, religion or belief and sexual orientation. PTUK appreciates and values the contributions of every registrant, associate and all others who work with PTUK to achieve its vision as befits the largest play therapy organisation in the UK.’ We will review how this policy is being implemented, at our next review.
- 5.2 PTUK also published its [LGBTQIA+ Policy Statement 2020](#) which sets out its expectations that ‘all members of PTUK staff and registrants behave in a way that respects the mental health and wellbeing of LGBTQIA+ people to enable LGBTQIA+ people to live full and equal lives.’
- 5.3 Oversight of the PTUK is provided by BCTIWC, which produces an annual report. We reviewed the BCTIWC’s 2020 annual report on PTUK¹. This provides examples of BCTIWC checking’ the work of PTUK, such as its advice to registrants regarding the Covid-19 pandemic, finding that this had been prompt and clear. The BCTIWC also reported that following an unplanned downtime of PTUK’s website, PTUK had not identified any data breaches and had reported the event to the Information Commissioners’ Office (ICO).
- 5.4 PTUK advised that it ‘cannot decide on new competencies, changes to working practices or similar without the agreement of the BCTIWC’. Recent examples of PTUK consulting with BCTIWC on key matters included its decision not to allow exemptions to its registration requirements if training providers had not been able to complete their syllabuses, due to the Covid-19 pandemic. PTUK had also consulted with the BCTIWC prior to deciding not to allow registrants to conduct online-play therapy services during lockdown periods.
- 5.5 In January 2021, PTUK published its [Unreasonably Persistent Contact and Unacceptable Behaviour Policy](#) which sets out how it responds to inappropriate behaviour towards its staff. Potential outcomes of the policy for members include sanctions such as suspension of registration. Appeals of outcomes will be considered by the BCTIWC.
- 5.6 We noted that during the timeframe under review, a registrant had submitted a complaint about PTUK. This complaint had been considered in the context of this policy. PTUK reported the concern had since been resolved to the satisfaction of all parties. However, we had a concern that given the serious nature of the complaint, whether it was appropriate in this case to have considered it under this policy. We further noted that the complaint had not been included within BCTIWC’s annual report, which PTUK confirmed during our review as an error.

¹ Available at: <https://www.bctiwc.org/>

- 5.7 The handling of this complaint raised concerns about whether PTUK considers organisational complaints in a transparent and open way, and about the robustness of the BCTWIC's oversight. Consequently, the Conditions set out at Standard 7 also apply to the Standard 5.
- 5.8 This Standard continues to be met subject to the Conditions set in Standard 7.

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.
- 6.2 This Standard continues to be met.

Standard 7: governance

- 7.1 At the 2019 annual review we issued a Recommendation (reissued in 2020) for PTUK to make sure that the certificates issued by APAC and PTUK did not give the impression that completion of APAC training then required membership of PTUK. We also asked PTUK to make sure that its communications did not suggest that 'play therapist' was a protected title.
- 7.2 PTUK advised us during this review that APAC would delete statements on qualifications that could suggest that graduate play therapists must retain membership of PTUK. PTUK would also post statements on its website confirming that university-issued qualifications were sufficient proof of meeting PTUK's education requirements, and that PTUK registration was voluntary. We found that the Recommendation had been considered.
- 7.3 As part of our review, we considered PTUK's arrangements for the management and oversight of the organisation following the death of its second Director and Registrar in July 2020, as set out under Standard 2.
- 7.4 We considered the fact that the Chief Executive of PTUK was also its sole Director and its (unsalaried) Company Director, in addition to holding the role of Chief Executive for PTUK's training provider APAC. Although a new Registrar was appointed during the period of our review, this role had also been carried out by the Chief Executive since July 2020. The Chief Executive is additionally the sole shareholding member, giving them majority voting rights on decisions taken at its Annual General Meeting.
- 7.5 PTUK has advised us that it has received legal advice that a single Director is acceptable for the size of the company. It has developed its Senior Management Team to assist the Chief Executive in key decision making. A Registrar has been appointed, although they are not a Director. The BCTIWC provides oversight and may challenge PTUK's decisions.
- 7.6 While the legal advice that PTUK has received may well be correct for a commercial organisation, we had concerns about whether a single Director who has overall control of the organisation (subject to oversight from the BCTIWC) is appropriate for a public interest organisation which licenses practitioners and has a role in protecting the public and where there is a strong interest in maintaining its role for the future.

- 7.7 We considered the evidence to whether the current arrangements had demonstrated enabled robust leadership and governance, in practice. The handling of a significant organisational complaint as outlined at Standard 5, indicated that challenge to the leadership had not been robust enough.
- 7.8 Aside from this example, the current arrangements for managing the Register may leave PTUK's business continuity vulnerable should the Chief Executive be unable to perform required company functions. PTUK advised that should its Chief Executive leave the post for any reason, a member of its Management Team would be elected as successor by the Team, PTUK's Office Manager and Finance Adviser. The BCTIWC would have a casting vote. The elected officer would take on all current responsibilities as Chief Executive, and shareholder.
- 7.9 We do not know whether any of the Senior Management Team has the skills and experience suitable for the role of Chief Executive, and they are not presently Directors. We think that broadening from a single Director to create a Board of Directors (as stated in its Articles) would strengthen the current leadership, decision-making skills and experience within PTUK. It would mean that there was proper continuity and assurance that the Chief Executive had the appropriate skills. This would reflect good practice in such bodies.
- 7.10 We identified inconsistencies with the naming and description of PTUK's governance arrangements in our review of documents. For example, the Senior Management Team was referred to by different names. This made it difficult to see where responsibilities for key functions lied. Although PTUK had advised its new Registrar had sole responsibility for registration decisions, this was not stated in any procedural documents. We think that this could mean that overall responsibility for registration decisions is unclear for the public, and PTUK's members.
- 7.11 Despite publication of its Articles of Association, the arrangements between BCTIWC and PTUK were also not clear to us from the documents provided and on their websites. For example, it is not clear whether PTUK is required to comply with directives from the BCTIWC. In some cases, BCTIWC is actively involved in decision making, which could present a conflict with its audit role. We think that the relationship between PTUK and BCTIWC, and responsibility for key functions in both these and the APAC, need to be set out clearly and published.
- 7.12 We acknowledge that the past year has been challenging for the PTUK, and that the Chief Executive has overcome difficult circumstances to continue to provide leadership for the Register. However, we believe that stronger arrangements for managing and oversight of the organisation must be made to ensure its continuity as an effective public register and to mitigate impacts should the current Chief Executive leave the post for any reason.
- 7.13 The following Conditions are issued:
- **Condition One:** Develop contingency plans for the continued operations and leadership of PTUK should the current Chief Executive leave their role. These should include how PTUK will ensure that persons named in the succession plan are equipped for the role of Chief Executive.

- **Condition Two:** Strengthen arrangements for the governance and oversight of leadership decisions affecting PTUK. This could include: expanding the Board of Directors so there is more than one Director; setting out clear delegation of responsibilities and decisions to the Senior Management Team within PTUK’s frameworks; enhancing the powers of non-shareholding members at the AGM; and strengthening the independence and robustness of the BCTIWC’s oversight of PTUK.
 - **Condition Three:** Publish clear details of the relationship between PTUK, APAC and the BCTIWC so that its clear to the public who has ultimate responsibility for key functions and how to raise a concern about any aspect of their work.
- 7.14 PTUK, APAC, and BCTIWC had all recently launched new websites. We will review the updates versions at the next annual review.
- 7.15 We noted that during the Covid-19 pandemic, PTUK had needed to take urgent decisions to address issues such as how play therapy should be practiced. During our review, we identified opportunities for PTUK to engage wider audiences when developing of new policies. In our view it is not sufficient simply to consult practitioners: patients and other stakeholders can have an important role in informing decisions We are issuing the following Recommendation to set this out:
- **Recommendation 1:** PTUK should identify groups who have a clear interest in its policies and processes and ensure that there are mechanisms to consult and take account of their feedback.
- 7.16 This Standard continues to be met subject to the above Conditions.

Standard 8: setting standards for registrants

- 8.1 PTUK advised that it had revised its [Safeguarding Policy for registrants](#). The policy requires registrants, and their clinical supervisors, to understand the safeguarding procedures of their employers. PTUK highlighted that it runs online meetings for clinical supervisors every three months, at which it issues updated guidance.
- 8.2 PTUK provided Covid-19 guidance to registrants on issues that could impact their indemnity cover. Registrants were encouraged to check whether their insurer required formal risk assessments to be carried out, and if personal protective equipment required approval.
- 8.3 PTUK had also directed registrants to advice produced by the UK Home Office. This included [Prevent](#) training to assist registrants to ‘safeguard vulnerable people from being radicalised to supporting terrorism or becoming terrorists themselves’ and training on safeguarding matters relating to Female Genital Mutilation (FGM).
- 8.4 This Standard continues to be met.

Standard 9: education and training

- 9.1 PTUK registrants may have been trained by PTUK’s affiliated training provider, APAC. PTUK accredits the clinical elements of APAC courses to

ensure training meets its standards. PTUK also determines whether APAC graduates are eligible to join PTUK's register. Due to PTUK's restructure, we checked whether how PTUK was managing potential conflicts of interest.

- 9.2 We noted that APAC courses delivered in the UK are also validated by Leeds Beckett (formerly Leeds Metropolitan) University for academic standards. Leeds Beckett University have revalidated APAC's 'MA in Practiced Based Play Therapy' programme in 2019 for six years. APAC courses delivered through Leeds Beckett University are also checked by external examiners and their reports are published. BCTIWC's scrutiny of this area includes interviews with APAC Course Directors.
- 9.3 We noted some Accredited Registers had used alternate methods of assuring applicants' competence if their training had been disrupted by the Covid-19 pandemic. PTUK had considered such measures, in consultation with the BCTIWC, and had decided not to allow exemptions to its published registration requirements.
- 9.4 This Standard continues to be met.

Standard 10: management of the register

- 10.1 The Authority considered PTUK's approach to the Covid-19 pandemic at the previous annual review. PTUK had provided further advice to registrants through its website, newsletters, Play for Life quarterly journal, and through Zoom meetings since March 2020. PTUK's Senior Management Team and Chief Executive also provided support.
- 10.2 When considering PTUK's reorganisation and development of its Senior Management Team, the Authority had considered it was not clear who held responsibility for key register functions, such as admissions. This presented a perceived conflict of interest if final decisions on applications were made by PTUK's Chief Executive, who was also Chief Executive of APAC. PTUK advised that during the assessment a new Registrar had been appointed. PTUK confirmed that the Registrar has final authority to accept, refuse, or remove registration from a practitioner, and that appeals or concerns regarding their decisions would be managed by the BCTIWC.
- 10.3 This Standard continues to be met.

Standard 11: complaints and concerns handling

- 11.1 At the previous annual review, we issued a Recommendation for PTUK to commission an independent review of its complaint processes. The review was to check whether the public might face potential barriers when raising complaints, including whether its processes were clear.
- 11.2 PTUK provided the outcome of its independent review, which had not identified any significant issues. PTUK had implemented the recommendations from the review. The Authority found that the Recommendation had been considered by PTUK.
- 11.3 We checked PTUK's [register website](#) as part of our assessment and had difficulty finding information about raising concerns. PTUK have since added a link to PTUK's complaints procedures to the website-footer.

- 11.4 As outlined under Standard 5, we received a concern through the Share Your Experience (SYE) process about PTUK's handling of an organisational complaint. PTUK reported, and the BCTIWC confirmed, that the concern had since been resolved successfully to the satisfaction of the complainant.
- 11.5 PTUK provided its '[PTUK Concerns and Compliments Policy](#)' policy which describes how compliments and concerns against PTUK registrants and staff will be managed and recorded. PTUK advised that all concerns were recorded internally on its Concerns and Compliments Log.
- 11.6 We noted that PTUK's [complaints processes](#) requires complaints to be 'triaged' by the Chief Executive to determine whether they were suitable for mediation or required formal disciplinary procedures. We considered that the Chief Executive's multiple roles within the organisation could impact on the perceived and actual fairness of PTUK's handling of complaints.
- 11.7 PTUK provided its updated complaints policy which stated that complaints will be recorded and managed by the PTUK Operations Manager. The Chief Executive will initially speak with the person raising the concern, however PTUK's Clinical Team Manager will determine whether mediation or other action is required. The Clinical Team Manager will appoint pre-hearing assessment panels to determine if there are grounds for a hearing and appoint Professional Conduct Panels. Such panels may include PTUK's Chief Executive, the Registrar, the BCTIWC Chair, and a lay person. Appeals against the decisions of PTUK panels will be managed independently by the BCTIWC.
- 11.8 We considered that the BCTIWC's scrutiny of PTUK's complaints handling could be compromised by its involvement in those processes. The BCTIWC Chair will sit on Professional Conduct Panels however appeals of decisions are made to the BCTIWC. The BCTIWC will also report on PTUK's handling of the same concerns.
- 11.9 Condition 2, set out in Standard 7, requires PTUK to strengthen the independence and oversight of the BCTIWC, is also required for Standard 11.

Share your experience

- 12.1 We received two submissions to the Share Your Experience (SYE) process.
- 12.2 The first raised a concern about PTUK's communications with a registrant and is addressed earlier in this report.
- 12.3 The second submission was provided by a PTI registrant working overseas. They raised concerns about PTI's handling of a contractual dispute between the registrant and their employer. We noted that as this related to PTI and overseas practitioners, it was outside the remit of the Accredited Registers programme. We asked PTUK if similar concerns by PTUK registrants could be considered within PTUK's Ethical Framework. PTUK confirmed that it could do so and stated that it had provided support to all parties to that dispute.
- 12.4 This Standard continues to be met subject to the Conditions set in Standard 7.

Impact assessment

- 13.1 We took account of the impact of our decision to reaccredit PTUK with Conditions.

Equality duty under the Equality Act 2010

- 14.1 We took account of our duty under the Equalities Act when deciding to reaccredit PTUK with Conditions.
- 14.2 PTUK provided its [LGBTQIA+ Policy Statement 2020](#) setting out its expectations that 'all members of PTUK staff and registrants behave in a way that respects the mental health and wellbeing of LGBTQIA+ people to enable LGBTQIA+ people to live full and equal lives.'
- 14.3 PTUK provided a draft of its [Equality and Diversity Policy](#) which states 'PTUK believes that every person has the right to live a life free from discrimination, harassment, bullying and disadvantage regardless of their age, disability, gender or gender choice, pregnancy and parental responsibilities, race, relationship status, religion or belief and sexual orientation. PTUK appreciates and values the contributions of every registrant, associate and all others who work with PTUK to achieve its vision as befits the largest play therapy organisation in the UK.'