

# **Accredited Registers**

**Condition Review: British Association of Play Therapists (BAPT)** 

# **April 2025**

## 1. Outcome

- At the British Association of Play Therapists (BAPT)'s accreditation renewal, the Professional Standards Authority ('we') issued seven Conditions of Accreditation.
- This report<sup>1</sup> evaluates the BAPT's progress in meeting Conditions One to Seven.
- Our assessment found that Conditions has been met, and we have issued three Recommendations to support the BAPT in further improving its practice.

# 2. Background`

- We assess registers against our Standards for Accredited Registers ('the Standards')² where a Register has not met the minimum requirement of a Standard, we can issue Conditions. A Condition sets out the requirements and the timeframe that a Register must meet.
- At BAPT 's accreditation renewal, completed in May 2024, we issued seven Conditions. All conditions were required to be completed by November 2024, except for Condition Four, which was to be implemented by August 2024. The Conditions to be addressed were:
- Condition One: The BAPT must develop procedures that ensure registrants disclose relevant professional conduct decisions, and that it has mechanisms to act on these.
- Condition Two: The BAPT must develop clear thresholds and criteria detailed when complaints may be suitable for informal resolution or must be escalated to formal procedures. This is to be implemented within six months.
- Condition Three: The BAPT must develop processes for the recruitment, training, and ongoing monitoring of key decision makers for disciplinary processes, to ensure they may effectively carry out their roles. This is to be implemented within six months.
- Condition Four: The BAPT must ensure that interim orders are displayed on register and profile entries, and on outcomes pages. This is to be completed within three months.
- Condition Five: The BAPT must make clear that complainants act as witnesses and are not required to act as a prosecutor during cases that reach the threshold for formal hearings.

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<sup>&</sup>lt;sup>1</sup> Report available at <u>British Association of Play Therapists | PSA</u>

<sup>&</sup>lt;sup>2</sup> Standards for Accredited Registers

- **Condition Six**: BAPT must enhance transparency through the publication of board minutes and related governance information accessible to the public. This should be implemented within six months of the publication of this report.
- Condition Seven: The BAPT should develop an organisational risk register and include regular review of this within its processes. This is to be implemented within six months.
- This report discusses the actions BAPT took to address the Condition, as well as our decision about whether the Condition is met.
- We reviewed the following evidence:
  - BAPT's reported actions about what it had done to meet Conditions.
  - The BAPT website and relevant Pages.
  - The updated <u>Professional Conduct Procedure Process Chart</u>
  - A spot-check of BAPT's <u>register</u>.

## 3. Concerns leading to the Conditions

- The concerns that led to the conditions were aimed at clarifying the complainant's role. Specifically, the professional conduct procedure did not include a hearing process, and the resolution process, as well as the no provision for publication of interim orders on the website.
- Additionally, concerns were raised regarding the lack of process for recruiting, training, and monitoring key decision-makers and the organisation's risk management. To enhance transparency, it was suggested that board minutes and related governance information be published and made accessible to the public.
- Further information is set out under Standard Two, Five and Six of the BAPT 's renewal assessment outcome<sup>3</sup>.

## 4. Assessment of Conditions

- The BAPT submitted its response to the Condition after the required deadline. We acknowledged the reasons provided for this, recognising that the brief delay may help ensure that procedures are properly in place to minimise risks to public safety or any potential negative impacts.
- The evidence for each Condition is outlined below.

## **Condition One**

 BAPT was required to develop mechanism for registrants to disclose relevant professional conduct decisions. The <u>application forms</u> 2024-2025 has been updated to include detailed disclosure, specifying criminal convictions and any disciplinary sanctions regarding their practice.

<sup>&</sup>lt;sup>3</sup> British Association of Play Therapists | PSA

- The BAPT is a signatory to the <u>AR Information Sharing Protocol</u>, which guides how fitness to practise decisions are shared with other Accredited Registers. BAPT clarified on their <u>website</u> that all regulatory bodies will be informed of the outcome of a complaint.
- Given the evidence that was submitted, we consider Condition One met.

## **Condition Two**

- The Professional Conduct Procedure (PCP) <u>flowchart</u> is updated on the website to include informal resolution. This sets out Complaint chair will facilitate the resolution process. The flowchart should be cross referenced to the PCP. We have given a recommendation to ensure that a procedure is consistent with the flowchart.
- The <u>Assessment Threshold Test</u> for complaints is developed and approval has been obtained for its use. This Condition has been met as the process flowchart establishes the resolution process along with threshold policy. However, we identified areas where additional detail would enhance its effectiveness. To support the BAPT in developing these aspects, we issued the following Recommendation:
- Recommendation One: The BAPT should incorporate the following points into its Informal resolution process:
  - Explain which types of complaints can be handled informally.
  - Set out clear procedure how informal resolution will be handled.
  - Include reference to the complaint process flowchart and clarify when the formal procedure will be initiated.

#### **Condition Three**

- Processes for the training, and monitoring, of the committees of the decision makers have been developed addressing training on organisational and complaints procedures.
- At the time of assessment, BAPT was in the process of recruiting panel members.
   We checked the <u>recruitment advertisement</u> for panel and lay members of Professional Conduct Panel.
- This outlines the roles and responsibilities of panel members, the person specification, and the terms and conditions of appointment. It also explains a process for recruiting committees involved in the disciplinary procedure. We are satisfied that this condition is now met.

## **Condition Four**

- The public protection <u>webpage</u> makes it clearer for the public to see which registrants are subject to interim suspension order. There was no interim order issued. We considered this might not be clear to a member of the public that someone is under interim suspension if searching by the Register alone.
- To assist a register user, identify interim orders without having to check the
  decisions page. We suggest that the BAPT may consider such as adding a direct
  hyperlink to the 'Decisions' page on the register page or listing interim suspension
  next to the registrants' register entry. BA

#### **Condition Five**

- The <u>Professional Conduct hearing process</u> (PCP) has been developed and approved by the Board, clearly outlining the role to prevent the complainant from acting as a prosecutor. Since the PCP does not currently cover the hearing process, we recommend updating the PCP to address this.
- Recommendation Two: The PCP should be revised/updated to include the hearing process.

#### **Condition Six**

- Information about Board minutes along with AGM minutes is now easily accessible
  on the <u>BAPT Board and AGM minutes</u> webpage, promoting transparency and ease
  of access for public. Information on structure and governance is clearly set out on
  'About BAPT' webpage, with functions of its various sub committees.
- At the time of assessment, BAPT is in the process of seeking consent from the sub committee's member for publishing their name on the website. We will check on this, at its next review.
- In light of the above information published on the BAPT website, we consider this
  condition met.

#### **Condition Seven**

- The BAPT has now developed an organisational risk register, setting out risks to its
  operations and sustainability with monitoring and management of risks. We noted
  that the risk matrix did not appear to be periodically reviewed. We have issued
  Recommendation to address this concern.
- Recommendation Three: BAPT should ensure that its Strategic Risk Register is periodically presented to its Board for review.

# 5. Conclusion

• The BAPT has met Conditions 1, 2 (with a recommendation), 3, 4, 5 (with a recommendation), 6 and 7 (with a recommendation). Our Recommendations will help the BAPT develop a more robust Professional Conduct Procedure that better serves both the public and its registrants.