

Accreditation renewal report

Standards 1-8

Play Therapy UK

November 2024

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About accreditation

The Professional Standards Authority (the Authority) accredits registers of people working in a variety of health and social care occupations that are not regulated by law. To become an Accredited Register, organisations holding registers of unregulated health and social care roles must prove that they meet our *Standards for Accredited Registers* (the Standards).

Initial accreditation decisions are made by an Accreditation Panel following an assessment of the organisation against the Standards by the Accreditation team. The Panel decides whether to accredit an organisation or not. The Panel can also decide to accredit with Conditions and provide Recommendations to the organisation.

- **Condition** – Issued when a Panel has determined that a Standard has not been met. A Condition sets out the requirements needed for the Accredited Register to meet the Standards, within a set timeframe. It may also reduce the period of accreditation subject to a review or the Condition being met.
- **Recommendation** – Actions that would improve practice and benefit the operation of the Register, but which is not a current requirement for accreditation to be maintained.

This assessment was carried out against our Standards for Accredited Registers¹ (“the Standards”) and our minimum requirements for the Standards as set out in our Evidence framework². More about how we assess against Standard One can be found in our Supplementary Guidance for Standard One³.

We used the following in our assessment of Play Therapy UK:

- Documentary review of evidence of benefits and risk supplied by PTUK and gathered through desk research
- Documentary review of evidence supplied by PTUK and gathered from public sources such as its website
- Due diligence checks
- Share your experience responses
- Assessment of PTUK’s complaints procedures

¹ https://www.professionalstandards.org.uk/docs/default-source/publications/standards/standards-for-accredited-registers.pdf?sfvrsn=e2577e20_8

² https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-evidence-framework-for-standards.pdf?sfvrsn=55f4920_9

³ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-supplementary-guidance-for-standard-one.pdf?sfvrsn=3e5f4920_6

The Outcome

The Accreditation Panel met on 4th October 2024 to consider Play Therapy UK (PTUK). The Panel was satisfied that Play Therapy UK met all the Standards for Accredited Registers.

We therefore decided to accredit PTUK.

We noted the following **positive findings**:

- PTUK carries out enhanced criminal record checks on all applicants. This is hugely significant for the protection of PTUK's client group: children and young people.
- Triple-layer quality assurance of the accuracy of PTUK's Register, including the role of an external regulator in the process (the British Council for Therapeutic Interventions with Children (BCTIWC), which audits PTUK on an annual basis).
- PTUK's education and training arm, the Academy of Play and Child Psychotherapy (APAC), won the best play therapy training provider in the UK at the 2022 Mental Health Awards. We welcome the incorporation of risk of suicide and self-harm into qualifying training for PTUK registrants and we recommend same for equivalence route applicants.
- We welcome PTUK's move to strengthen its stance on business continuity. PTUK's Articles of Association are currently being amended to get business continuity firmly enshrined in its governing instrument.

We issued the following Recommendations to be considered by the next review:

Recommendations	
Standard 3	1. PTUK should review the section in its Ethical Framework entitled "When Things go Wrong" to strengthen and make more proactive its position on the principle of openness as an element of the Duty of Candour
Standard 5	2. PTUK should deliver equality, diversity and inclusion (EDI) training to its Board, staff and volunteers in line with the recommendation in its Standard 9 EDI report
Standard 6	3. PTUK should publish for greater transparency a register of interests and other non-confidential papers circulated for Board meetings 4. PTUK should deliver EDI training to its Board, staff and volunteers in line with the recommendation in its Standard 9 EDI report

Standard 7	<ol style="list-style-type: none"> 5. PTUK should update its risk matrix to consider the role of registrants in identifying and acting on risks related to the safeguarding of children 6. PTUK should update its risk matrix to consider the risk of suicide and self-harm 7. PTUK should review its equivalence route processes to include prior training on the risk of suicide and self-harm as a requirement for registration 8. BCTIWC should include in its annual audit process the risk assessment conducted by PTUK to minimise the chances of a risk being missed
Standard 8	<ol style="list-style-type: none"> 9. PTUK should include on the search page of the Register a clarifying statement that PSA's Quality Mark is applicable to UK registrants only

About the Register

This section provides an overview of PTUK and its register.

Name of Organisation	Play Therapy UK
Website	https://playtherapyregister.org.uk/ https://playtherapy.org.uk/
Type of Organisation	PTUK is a private limited company registered in England and Wales (company number 04596316) Registered Address: The Coach House, Belmont Road, Uckfield, East Sussex, TN22 1BP
Role(s) covered	<ul style="list-style-type: none"> • Certified Play Therapist • Accredited Play Therapist • Certified Practitioner in Therapeutic Play Skills • Filial Play Coach • Certified Play and Creative Arts Counsellor of Children and Young People (CCYP) • Certified Supervisor of Play and Creative Arts Therapists • Trainee
Number of registrants	2672 as of 1 January 2024
Overview of Governance	<p>PTUK is a professional body for 'Play and Creative Arts Therapists (Play Therapists) within the UK. It operates its Register of Play and Creative Arts Therapies at: Register of Play and Creative Arts Therapists (playtherapyregister.org.uk).</p> <p>PTUK has three Directors: the Chief Executive (also holds the role of Chief Executive for PTUK's training provider the Academy of Play and Child Psychotherapy (APAC)), Operations Director and Clinical Director. PTUK has an employed Registrar and other staff.</p> <p>The British Council for Therapeutic Interventions With Children (BCTIWC) (Home - The British Council for Therapeutic Interventions With Children (bctiwc.org)) provides oversight of PTUK's functions and investigates complaints against PTUK.</p> <p>At PTUK's 2021 annual review Conditions had been set requiring PTUK to review its governance.</p>

Overview of the aims of the register

From the [Register of Play and Creative Arts Therapists \(playtherapyregister.org.uk\)](http://playtherapyregister.org.uk):

- ‘People on our register meet PTUK’s standards for safe and effective practice. This is especially important for working with the most vulnerable client group, children.
- It enables members of the public and employers to find practitioners easily and to understand what they offer.
- It provides an assurance of high-quality practice.
- It provides commissioners with additional assurance when placing contracts for services for working with children’s social, emotional, behaviour and mental health problems.

Inherent risks of the practice

This section uses the criteria developed as part of the Authority’s *Right Touch Assurance tool*⁴ to give an overview of the work of Play Therapy Practitioners

Risk criteria	Play Therapy Practitioners
<p>1. Scale of risk associated with Play Therapy Practitioners.</p> <p><i>a. What do Play Therapy Practitioners do?</i></p> <p><i>b. How many Play Therapy Practitioners are there?</i></p> <p><i>c. Where do Play Therapy Practitioners work?</i></p> <p><i>d. Size of actual/potential service user group</i></p>	<p>a. ‘Play Therapists and Practitioners in Therapeutic Play work with children (clients) aged 4 -13 years old, to support them to work through difficult and traumatic events, which are impacting on their everyday life preventing them from reaching their full potential. Play and Creative Arts Counsellors of Children and Young People (YP), provides services to children 14 – 18 years old. Children and YP can self-refer, parent permission is not required where a child, YP can meet Gillick competencies. A core measure is used to explore at the beginning of the intervention how the child, YP is feeling and managing, this is repeated at the end of the intervention’.</p> <p>‘Filial Play Coaches work mostly with parents, supporting parents to use techniques to connect with their child (children under the age of 4 years) using play. Parents complete the Ages and Stages Questionnaire at the beginning and end of the intervention. Parents gain confidence to engage with their child and maintain consistent boundaries’.</p> <p>‘Certified Supervisors of Play and Creative Arts Therapist, work with trainee and qualified therapists. Providing clinical supervision to oversee client work, support the therapist with their client work and to provide an insight into the work using creative media’.</p> <p>b. There is an increase in registrants: 2520 registrants as of 1 January 2023; 2672 registrants as of 1 January 2024.</p>

⁴ https://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/right-touch-assurance---a-methodology-for-assessing-and-assuring-occupational-risk-of-harm91c118f761926971a151ff000072e7a6.pdf?sfvrsn=f537120_14.

	<p>c. Registrants may work in private practice, or in public/private employment including within schools.</p> <p>d. Some service users may have long term health issues or disabilities. Play Therapists' scope of practice has focussed on work with children and young people. However, PTUK has applied for a new title for working with adults.</p>
<p>2. Means of assurance</p>	<p>The PTUK Register includes play therapist practitioners who have met PTUK's standards for registration. The means of assurance will depend on the practice setting. For managed premises, such as NHS settings and schools, there will be criminal records and other pre-employment checks required.</p> <p>In Sep 2023, we noted that PTUK applied to add a new title of Certified Play and Creative Arts Counsellor for Adults in autumn 2022. The public interest test has not included the new titles assessment because PTUK has not yet submitted the further evidence the Accreditation Panel requested when they first considered the Notification of Change submission.</p> <p>Form A1 was submitted on Feb 22, 2022.</p>
<p>3. About the sector in which Play Therapy Practitioners operate</p>	<p>Play Therapy can be a particularly helpful approach for children in need of therapeutic support. Using play means that the child can explore their thoughts and feelings in creative and dynamic ways, without having to use words to articulate themselves. In Play Therapy sessions, children explore their own creativity and express themselves using media such as: drawing and painting, water and clay, sand tray and miniatures, guided imagery and relaxation techniques, drama and puppetry, poetry, movement, and music.</p> <p>Play Therapy provides the expertise and time to do this through play. Play Therapy sessions aim to build a child's ability to develop healthy and resilient relationships, and to work through traumatic experiences which may be preoccupying them.</p>
<p>4. Risk perception</p> <ul style="list-style-type: none"> • <i>Need for public confidence in Play Therapy Practitioners?</i> • <i>Need for assurance for employers or other stakeholders?</i> 	<p>Registrants are likely to work independently or private practice, it is important that members of the public have confidence in the practitioners they choose to deliver therapy.</p> <p>The specific approach of PTUK, which may not always be available as part of mainstream NHS services, makes it important that the public are aware of what to expect from practitioners. Since registrants working with children, it is important that the public can have confidence there are appropriate safeguards in place.</p>

Assessment against the Standards

Standard One: Eligibility and ‘public interest test’

- 1.1 We are in the process of assessing all current Accredited Registers against Standard One, which was introduced in July 2021. Decisions about Standard One for current Accredited Registers are made separately by the Accreditation Team if no concerns are identified.
- 1.2 We completed our Standard One assessment for PTUK in March 2024. We found that PTUK’s register falls within the scope of the Accredited Registers programme. We considered that the work of play therapists can be beneficial. We found it is in the public interest to have registers of play therapy practitioners who meet appropriate standards of competence, conduct, and business practice, such as those required by PTUK.
- 1.3 Consequently, the Accreditation Team found that Standard One was met. We did not identify during this assessment of Standards Two to Eight any new information that could affect Standard One being met.

Standard 2: Management of the register

Summary

The Accreditation Panel found that Standard Two was met. It issued no Conditions or Recommendations.

Accreditation Panel findings

- 2.1 We found that PTUK’s membership categories and corresponding membership fees are published on its website. The requirements for entry into each of these grades of membership are clearly outlined on the website, in some cases with additional explanatory notes. The Accreditation Team checks revealed that a generic PTUK appeals process exists and is indeed published on their website. This appeals procedure deals with all categories of complaints, including complaints about registration. We confirmed that PTUK’s Complaints and Concerns Procedure outlines the various stages of the complaints process.
- 2.2 The Accreditation Team found that PTUK has a stringent process in place to ensure that applicants meet its registration requirements. PTUK’s new members are mostly graduates who have taken courses at the Academy of Play and Child Psychotherapy (APAC), through which applicants complete the enrolment form as well as a standalone PTUK Membership Form. In addition, PTUK has a process of annual membership revalidation. Through this, a signed confirmation is sought that the registrant has satisfied PTUK’s continuous practice competence requirements through continuous professional development (CPD).

2.3 We also found that PTUK conducts enhanced criminal record checks on every applicant and run their names past a list of barred or excluded members by other Accredited Registers. This is in addition to being a signatory to the Accredited Registers' memorandum of understanding (MoU) on the Information Sharing Protocol.

2.4 Moreover, the Accreditation Team found that PTUK's register displays the minimum information required for our purposes. We confirmed that the information on PTUK's register is clear, accurate and easily accessible. PTUK has a sanctions page and a page on registrants that have been struck off the register, both of which hold information on restrictions on practice. We also found that PTUK has a triple-layer process for updating and quality assuring the accuracy of the information on its register. PTUK, additionally, has a clear and published restoration policy for readmitting registrants following disciplinary action.

2.5 The Panel decided that Standard Two was met.

Standard 3: Standards for registrants

Summary

The Accreditation Panel found that Standard Three was met. It issued the following Recommendation:

Recommendation One

- PTUK should review the section in its Ethical Framework entitled "When Things go Wrong" to strengthen and make more proactive its position on the principle of openness as an element of the Duty of Candour.

Accreditation Panel findings

3.1 The Accreditation Team confirmed that PTUK made available its published membership application form as evidence of the agreement between it and its registrants. PTUK's membership form, therefore, constitutes a contractual agreement between the Register and its registrants.

3.2 PTUK also has an Ethical Framework, and this is published on its website. The Ethical Framework sets out what is expected of registrants and outlines the organisation's values and principles as well as the personal qualities required of registrants. PTUK's Ethical Framework also outlines the modalities for ensuring the health, safety and wellbeing of children and young people that PTUK registrants would encounter.

3.3 We assessed PTUK's Safeguarding Policy as adequate for our purposes, and this is published on its website. PTUK submitted no standalone Duty of Candour policy for this assessment. However, the Accreditation Team found that a section of PTUK's Ethical Framework, entitled "When Things Go Wrong", relates to candour. The Panel then considered whether all the principles of the Duty of Candour have been adequately addressed throughout PTUK's Ethical Framework.

3.4 On the direction of the Panel, the Accreditation Team again reviewed the content of PTUK's Ethical Framework to ensure that the principles of Duty of Candour were fully engaged. The Team found that the Framework may be weak or not clear enough on one element of the principles – openness when things go wrong. The Accreditation Team also concluded that the Framework is more responsive (ie a client brings a matter forward) than proactive. **The Panel consequently issued the following recommendation:**

Recommendation One:

- PTUK should review the section in its Ethical Framework entitled “When Things go Wrong” to strengthen and make more proactive its position on the principle of openness as an element of the Duty of Candour

3.5 PTUK has a specific Data Processing agreement with its registrants as well as policies on Recording Clinical Information on Fortuna and Retention of Records. We also confirmed that PTUK is registered with the Information Commissioner's Office (ICO).

3.6 The Panel discussed that there may be a lack of clarity around the requirement for the complaints process operated by a registrant. The requirement for PTUK registrants to have procedures for considering complaints and, where necessary, escalate to the register was not applicable as all PTUK registrants are subject to PTUK's Complaints and Concerns Procedure. This forms part of the terms and conditions of PTUK membership. However, PTUK's membership form was not itself explicit that registrants must have a complaints process. Instead, the membership form points to PTUK's Ethical Framework which expects practitioners to respond promptly and appropriately to any complaint. The Panel agreed that the minimum requirement was met.

3.7 Our checks revealed that while PTUK makes holding a professional indemnity cover a requirement for revalidation, it omitted to place a similar requirement at initial registration. However, this omission was rectified prior to the panel hearing. The Panel consequently judged that the minimum requirement was met.

3.8 We were able to confirm that none of the registrants' websites checked had any inappropriate advertising. On the contrary, all registrants appeared to advertise their services in line with the relevance of their roles.

3.9 The Panel decided that Standard Three was met with a recommendation.

Standard 4: Education and training

The Accreditation Panel found that Standard Four was met. It issued no Conditions or Recommendations:

Accreditation Panel findings

4.1 We found that PTUK's clinical grades are underpinned by strict entry criteria. The courses that lead to these grades, and which PTUK accepts for entry into its register,

are accredited by a reputable national institution that maintains rigorous standards. PTUK effectively train their own members via these courses, offered by the Academy of Play and Child Psychotherapy (APAC).

4.2 APAC describes itself as “the largest and most experienced and dedicated Play Therapy Training Organisation in the world”. We confirmed that APAC’s courses are quality assured by the University of Chichester, and that this information is clearly published on the PTUK website.

4.3 The Panel had an extended debate on the relationship between APAC and PTUK, and whether this met our expectations. The Accreditation Team confirmed that an earlier review had dealt with this in January 2024, in which BCTIWC assumed the role of auditing that relationship and reporting any conflicts of interest. The Panel was briefed that a recommendation from the January 2024 Conditions review, requiring a clear statement on the relationship between PTUK and BCTIWC to be published on the Corporate Governance section of the PTUK website, had been acted upon. The Team also confirmed that BCTIWC’s annual report for 2023-2024 concluded that they detected no conflict between PTUK and APAC. Accordingly, the Panel was satisfied that this issue was being monitored and did not issue a condition or recommendation.

4.4 The Accreditation Team also found that PTUK’s competency framework for its qualifying courses for membership admittance now have relevant components on EDI. This fundamentally requires trainees to develop and learn the skills necessary to be able to deliver high quality care to a diverse population.

4.5 We also found that PTUK runs continuous professional development (CPD) courses and has a clear mechanism in place within the organisation for quality assuring them. The Panel was informed that PTUK has plans to have an external accreditation process (via a company independent of PTUK and APAC) for these courses. Through the core competencies of, and the gradual embedding of EDI into, the courses it accepts for membership of its register PTUK ensures that trainee registrants receive training on the wider health and social system. This is reinforced through regular dissemination of relevant links from the NHS and other government websites to its members.

4.6 Additionally, PTUK’s website page on membership grades and fees contains detailed information on the educational requirements for entry into the PTUK register. Moreover, PTUK recognises other equivalence courses of the “same standing” and will admit anyone “adequately trained and qualified” into its register based on APAC’s Recognition of Prior Learning (RPL) policy.

4.7 Accordingly, the Panel concluded that Standard Four was met.

Standard 5: Complaints and concerns about registrants

The Accreditation Panel found that Standard Five was met. It issued the following Recommendation:

Recommendation Two:

- PTUK should deliver EDI training to its Board, staff and volunteers in line with the recommendation in its Standard 9 EDI report

Accreditation Panel findings

5.1 We found that PTUK has a Complaints and Concerns Procedure, and that this is published on its website and therefore accessible to its members, registrants, service users and the public. Stages 4A and 5A of PTUK's Complaints and Concerns Procedure provide for appeal against an Assessment Panel decision and a Professional Conduct Panel Hearing decision respectively. We judged that PTUK's commitment to providing support during the complaints process is underlined by provision for that in the Complaints and Concerns Procedure.

5.2 We confirmed that PTUK has a Recruitment Policy, indicating that it has a carefully thought-out process for recruiting key decision makers involved in the disciplinary process.

5.3 On the absence of any evidence on EDI training, the Panel considered if this needed to be a condition, considering that the minimum requirement has been in operation for some time. This is balanced against the fact that the more recent introduction of Standard 9 means we currently have a policy of placing recommendations only on matters related to EDI. The Panel was informed that this is also the first full renewal assessment for PTUK. Against this background, the Panel settled on giving a recommendation to remain consistent with prior practice and because it will drive a consistent approach to meeting standards related to EDI when assessed next. **The Panel issued the following recommendation:**

Recommendation Two:

- PTUK should deliver EDI training to its Board, staff and volunteers in line with the recommendation in its Standard 9 EDI report

5.4 The Panel agreed that the same recommendation should apply to Standard 6.

5.5 PTUK's complaints policy makes provision for quality assuring its disciplinary decisions. We confirmed that PTUK has a process through which complaints are audited annually by an independent assessor (BCTIWC) to ensure fairness and consistency across the board. Stage 2 of PTUK's Complaints and Concerns Procedure covers matters relating to restrictions on practice where there are serious safety concerns.

5.6 Against this background of quality assurance of complaints, the Panel examined in detail the lone response from our "share your experience" (SYE) process. The matter was regarded by the Register as still "active". The Panel noted, nevertheless, that the experience in the SYE points to places where PTUK could have communicated more clearly with the complainant. The Panel also noted that BCTIWC undertook an audit that was apparently inclusive of this concern but did not identify any learning in its 2023-2024 annual report on PTUK. The Panel, therefore, noted that the experience in this SYE and the fact that no learning was identified through BCTIWC's audit, pointed towards the increased potential for a PSA audit of complaints at the next opportunity. BCTIWC's learning points were eventually made available to the Accreditation Team, but only in the aftermath of our post-hearing follow up with PTUK.

5.7 The Panel further identified the need for PTUK to always be open to engagement with complainants, except in rare or exceptional circumstances. PTUK's complaints policy should entail a process that guides decisions about when to stop engaging. We note that BCTIWC has now shared the helpful recommendations it made to PTUK to this effect. This is consistent with the Panel's view that BCTIWC should have a stronger role in identifying and sharing learnings from PTUK's complaints handling.

5.8 The Panel felt that overall, no minimum requirement failed to be met; however, it directed that the Accreditation Team should engage informally to encourage PTUK to search for a satisfactory resolution to the dispute. PTUK was amenable to this suggestion when contacted by the Accreditation Team after the hearing.

5.9 The Accreditation Team also found that PTUK's Complaints and Concerns Procedure provides for separation of individuals within the adjudication process as well as separation between those involved in the adjudication of complaints process and those charged with overseeing the administration of PTUK as an organisation (Board, Committees, and Chief Executive). The Team further confirmed that the responsibility for investigating and prosecuting complaints in the PTUK adjudication process resides solely with the organisation. If required at a hearing, the complainant will only attend as a witness. Similarly, lay involvement in complaints decisions is clearly provided for in PTUK's Complaints and Concerns Procedure.

5.10 The Accreditation Team found that PTUK's Safeguarding Policy provides for a clear process for reporting concerns to other relevant agencies. We were able to confirm PTUK's claim that they are a signatory to the MoU on the Information Sharing Protocol, an initiative of the Accredited Registers Collaborative, and that they have links with the Local Safeguarding Children's Board and the Multi-Agency Safeguarding Hub.

5.11 In addition, PTUK's commitment to transparency about complaints outcomes is enshrined in both its sanctions and publications policies.

5.12 The Panel, therefore, decided that Standard Five was met with recommendations.

Standard 6: Governance

The Accreditation Panel found that Standard Six was met. It issued the following recommendations:

Recommendation Three:

- PTUK should publish for greater transparency a register of interests and other non-confidential papers circulated for Board meetings

Recommendation Four:

- PTUK should deliver EDI training to its Board, staff and volunteers in line with the recommendation in its Standard 9 EDI report

Accreditation Panel findings

6.1 We confirmed that PTUK is a private limited company incorporated in November 2002 and submitted for this assessment its Memorandum and Articles of Association. Its public protection purpose is encapsulated in its vision, and this is published on its website.

6.2 The Accreditation Team found that PTUK has a conflict-of-interest policy, and this was submitted for review. Similarly, PTUK's governance structure provides for clear separation between various functions of the organisation. The Panel discussed the recently updated webpages that reflect the completion of the recommendations made in January 2024. The Panel was satisfied that the current position indicates that there is institutional oversight of the separation of the various governance arms, which ensures that the Standard continues to be met.

6.3 We checked and confirmed that PTUK Board minutes are published on its website but noted that other papers circulated for Board meetings were not published. The Panel discussed and agreed the recommendation to publish more information. The Panel issued a directive that the recommendation must be explicit in including register of interests because of the organisational structure of PTUK, which is complex, to avoid conflicts of interest. **The Panel, accordingly, issued the following recommendation:**

Recommendation Three:

- PTUK should publish for greater transparency a register of interests and other non-confidential papers circulated for Board meetings

6.4 The Accreditation Team confirmed that PTUK's Complaints and Concerns Procedure is also published, and this provides for anyone to make an organisational complaint. PTUK affirmed that they have liability insurance in place. Its annual budget setting process commences in December when the revalidation is open and finalises in March each year. The Panel noted that PTUK has consistently filed with Companies House its "total exemption" and "unaudited" Accounts (and other returns) since incorporation in 2002.

6.5 PTUK's data collection and processing policy was found to be comprehensive and covers EDI data. The Accreditation Team confirmed that PTUK has solid business continuity arrangements in place, such as their annual forecasting, the production of annual accounts, and their consistent and regular Board meetings. These would be strengthened with an amendment to the Articles of Association.

6.6 We reviewed PTUK's latest Risk Matrix. This documented approach should enable PTUK's Board to constantly monitor the risks identified, assess the likelihood of them occurring and their impact, and take prompt and effective action when necessary. The Panel identified a few gaps in this area and made corresponding recommendations. These are considered in detail under Standard 7.

6.7 The Panel noted the Accreditation Team's submission that all governance arrangements of PTUK are published on their website. Job descriptions for all positions exist, including that of the Chief Executive Officer. Terms of reference for Board Directors are embedded in their Memorandum and Articles of Association.

6.8 The team found that PTUK has policies on recruitment and EDI as evidence of inclusive practice in its governance and membership arrangements. The Panel, however, noted that the recommendation on EDI training identified in Standard Five should apply to this Standard. **The Panel, therefore, issued the following recommendation:**

Recommendation Four:

- PTUK should deliver EDI training to its Board, staff and volunteers in line with the recommendation in its Standard 9 EDI report

6.9 The Panel agreed that Standard Six was met with recommendations.

Standard 7: Management of the risks arising from the activities of registrants

The Accreditation Panel found that Standard Seven was met. It issued the following Recommendations:

Recommendation Five:

- PTUK should update its risk matrix to consider the role of registrants in identifying and acting on risks related to the safeguarding of children

Recommendation Six:

- PTUK should update its risk matrix to consider the risk of suicide and self-harm

Recommendation Seven:

- PTUK should review its equivalence route processes to include prior training on the risk of suicide and self-harm as a requirement for registration

Recommendation Eight:

- BCTIWC should include in its annual audit process the risk assessment conducted by PTUK to minimise the chances of a risk being missed.

Accreditation Panel findings

7.1 The Accreditation Team confirmed that PTUK submitted for this assessment its latest Risk Matrix. In it, PTUK have identified risks relating to personal behaviour, technical competence, business practice, market conditions, and technology for therapeutic purposes. The impact of these risks, the accompanying mitigation measures PTUK has put in place, and the risks owners are all clearly identified. This

documented approach should enable PTUK's Board to constantly monitor the risks identified, assess the likelihood of them occurring and their impact, and take prompt and effective action when necessary.

7.2 The Panel discussed that there is the likelihood that a risk may have been missed in the assessment around the heightened potential for PTUK registrants to identify and act on risks related to safeguarding of children (as opposed to the safeguarding risks that may arise from a registrant). The Panel directed the Accreditation Team to scrutinise similar examples of Accredited Registers to determine if this would constitute a recommendation or Condition, and to feed back to the Panel. The Panel accepted the team's findings that the picture in this regard among a sample of Accredited Registers was variable. **The Panel accordingly issued the following recommendation:**

Recommendation Five:

- PTUK should update its risk matrix to consider the role of registrants in identifying and acting on risks related to the safeguarding of children

7.3 The Panel discussed that while PTUK's risk matrix acknowledges the harm that can be caused to clients by the personal behaviour and low technical competence of its registrants, it appears to have overlooked the important and sensitive issue of risk of suicide and self-harm. The Panel agreed that there is the potential for a risk missed in the assessment around suicide risk and self-harm for safeguarding of children. **The Panel, therefore, issued the following recommendation:**

Recommendation Six:

- PTUK should update its risk matrix to consider the risk of suicide and self-harm

7.4 The Panel discussed the incorporation of risk of suicide and self-harm into qualifying training for PTUK registrants and noted that this was highly commendable. The Panel then discussed whether this might leave a gap for people entering the register through equivalence processes and directed the Accreditation Team to enquire with the PTUK what arrangements exist for this type of applicants. The Team confirmed that APAC's recognition of prior learning (RPL) policy does not make a similar requirement for applicants entering the register through equivalence routes. **The Panel, therefore, issued the following recommendation to encourage the PTUK to close that gap:**

Recommendation Seven:

- PTUK should review its equivalence route processes to include prior training on the risk of suicide and self-harm as a requirement for registration

7.5 The Panel further discussed the efficacy of an independent review of risks and considered whether the BCTIWC should include in its audit the risk assessment conducted by PTUK. The Panel issued a direction to the Accreditation Team to check the arrangements. The Team confirmed that BCTIWC audits do not encompass a review of the risks of practice conducted by PTUK. **The Panel accordingly issued the following recommendation:**

Recommendation Eight:

- BCTIWC should include in its annual audit process the risk assessment conducted by PTUK to minimise the chances of a risk being missed

7.6 The Accreditation Team has acted on the directive of the Panel to feedback informally the Panel's views on PSA being named as a risk owner.

7.7 PTUK's website and other materials, such as videos, provide clear and accessible information about the benefits and limitations of play therapy. The organisation's website holds a lot of information on play therapy for children, parents and teachers.

7.8 The Panel decided that Standard Seven was met with recommendations.

Standard 8: Communications and engagement

The Accreditation Panel found that Standard Eight was met. It issued the following Recommendation:

Recommendation Nine:

- PTUK should include on the search page of the Register a clarifying statement that PSA's Quality Mark is applicable to UK registrants only

Accreditation Panel findings

8.1 We found that PTUK has a website that is clear and easily accessible to the public. PTUK informed us that they are constantly improving the website to make it accessible by all.

8.2 PTUK's published statements on its website and other public materials provide clear and accessible information on the benefits and limitations of play therapy. PTUK operates a few social media accounts, and its published materials on these platforms are similarly consistent with the organisation's aims, objectives, vision, ethos, and programme of work.

8.3 The Accreditation Team confirmed that PTUK, as a member of the Accredited Registers Collaborative, attends all its meetings. Accordingly, PTUK's website

provides a lot of information about the accreditation programme and the register of Play and Creative Arts Therapists in the UK.

8.4 We noted that the PSA's Quality Mark (QM) can be found on every page of PTUK's website. While the Panel welcomed this, a vibrant debate ensued around the use of our QM in the context of a Register with an international arm. The Panel discussed the likelihood of confusion in the specific instance where the QM logo is included on the search page of the Register, where international members are also represented. The Panel discussed that even when you search for international registrants the QM appears. However, the Panel was clear that there was no evidence that the minimum requirement was not being met. This matter solely relates to the presentation of the Register and how it might be interpreted by a lay person. The Panel felt this was potentially misleading and it would be reasonable to provide a recommendation for PTUK to provide a clarifying statement. **The Panel accordingly made the following recommendation:**

Recommendation Nine:

- PTUK should include on the search page of the Register a clarifying statement that PSA's Quality Mark is applicable to UK registrants only

8.5 We found that all PTUK's key governance and organisational processes are published on its website. These include membership registration criteria and grades for entry into PTUK's Register, accreditation, re-admission, revalidation, complaints procedure, appeals, and recruitment. PTUK has several identifiable processes in place to solicit, understand and utilise the views and experiences of its service users and other stakeholders. These include feedback through its website, surveys, social media platforms, videos, and annual conferences.

8.6 Against this background, the Panel decided that Standard Eight was met with a recommendation.

Standard 9: Equality, Diversity and Inclusion

9.1 The Accreditation Panel was briefed that Standard 9 was not assessed as part of this Full Renewal. PTUK had been assessed separately for Standard 9 in July 2024. This assessment only included Standards 2 – 8.

Share your experience

We ran a public consultation for PTUK between August and September 2024. We received one response to the invitation to share experience of PTUK. This was in relation to PTUK's complaints handling processes. However, the matter was regarded by the organisation as still "active". Consequently, the Panel was unable to express a public position on a matter that was still under adjudication. The Panel, however, directed that the Accreditation Team should engage informally in the

interim to encourage PTUK to search for a satisfactory resolution to the dispute. The panel further noted that this matter was covered in BCTIWC's audit of complaints for 2023-2024, but no learning was identified or shared prior to the hearing.

Impact assessment (including Equalities impact)

We carried out an impact assessment: [Impact Assessment PTUK 2024.docx](#) as part of our decision to renew PTUK's accreditation. This impact assessment included an equalities impact assessment as part of the consideration of our duty under the Equality Act 2010.

The Panel noted that Play Therapy is a fast-growing profession which, if left unregulated, can endanger children's health and well-being and have a long-lasting detrimental impact on their mental health.

The Panel, therefore, noted several positive impacts in renewing PTUK's accreditation. PTUK maintains oversight over the provision of services to a critical client group in society - children and young people. PTUK estimates that 1 in 5 of our children have some form of psychological problem. However, between 72% and 83% of these children show a positive change when play therapy is delivered to acceptable standards, such as those of PTUK.

PTUK carries out routine criminal record checks on all applicants and run these through a list of barred or excluded members by other Accredited Registers prior to admission into the register. This vital process is adhered to diligently as part of discharging its safeguarding responsibilities.

The Panel noted that it was more likely that women will be impacted most by PTUK's re-accreditation, as they are more likely to be primary carers. Thus, the Panel felt that the existence of a well-operated register was likely to be a positive benefit for women.

The Panel highlighted the need for PTUK to enhance its oversight role by considering a broader approach to safeguarding in its routine assessment of risks, including the safeguarding of children and the risk of suicide and self-harm.