

Annual review of accreditation 2019/20

The Association of Child Psychotherapists (ACP)

July 2019

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About the Association of Child Psychotherapists (the ACP):

The ACP registers:

- Child and Adolescent Psychoanalytic Psychotherapists in the United Kingdom

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.

As of April 2019, there were 646 registrants on the ACP's register.

The ACP was first accredited on 20 November 2014. This is its fifth annual review and this report covers 20 June 2018 to 20 June 2019.

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 and note Achievements.

- **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
- **Achievement** – Areas where a register has demonstrated a positive impact on one of the four pillars of the programme; protection, choice, confidence and quality.

Outcome

Accreditation for the ACP was renewed for the period of 20 June 2019 to 20 June 2020.

Accreditation was renewed a Moderator following a review of evidence gathered by the Accreditation team and supplied by the ACP.

The following Recommendation was issued to be implemented by submission of annual renewal documentation.

1. The ACP should consider developing its policy on the duty of candour.
(paragraph 8.3)

The following report provides detail supporting the outcome.

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 There were no significant changes reported or noted in the past year.
- 1.2 The ACP had seen an increase in the number of registrants on its register in the past year, from 639 to 646. ACP reported that most registrants who did not renew registration did so due to maternity leave.
- 1.3 The ACP reported that the organisation had turned 70 and had used this opportunity to highlight its achievements since forming in 1949.
- 1.4 The Authority found that this Standard continues 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 There were no significant changes reported or noted in the past year.
- 2.2 The Authority noted the development of the new ACP Board Scrutiny Group, and the work of its Ethical Practice Group, in Standard 7.
- 2.3 The Authority found that this Standard continues to be met

Standard 3: risk management

- 3.1 At the previous annual review, the Authority noted that the residual risk rating for many risks on the ACP's risk matrix was either the same or higher than the rating for the inherent risk, despite the mitigating actions, which could suggest that those actions were either ineffective or detrimental. The Authority had issued a Recommendation for the ACP to review its risk matrix to ensure that its scores were accurate and reflect the effectiveness of mitigations in place. The ACP advised that the matrix had been reviewed by its committees and changes approved by the Board.
- 3.2 The Authority checked ACP's risk matrix and noted that risks that were marked higher after mitigating actions by ACP had been reviewed and that no 'increasing' risks remained. Many risk scores remained static, however the ACP explained how effective and appropriate mitigating actions were in place. The Authority was satisfied with the ACP's response and did not identify any concerns with its management of risk.
- 3.3 The ACP advised it was developing a new corporate risk register to manage risks related to it as an organisation, to inform its future direction and decision making.
- 3.4 This year the Authority is considering the Accredited Registers' approach to safeguarding issues; how registers are prepared to protect children, young and vulnerable people from abuse and neglect. The Authority noted that as a register for practitioners working primarily with children and young people, the

ACP's risk management practices were focussed on risks that may occur when treating these groups.

- 3.5 The Authority noted the ACP had conducted 'Safeguarding awareness training' as a CPD event and asked if its education and training programmes also covered safeguarding. The ACP responded that as 'all ACP trainees are employed by an NHS Trust it would always be part of all trainees' experiences during their placements as their Trusts will require safeguarding children and safeguarding vulnerable adults as mandatory training. The expectation would be that this is level 3 training.' The ACP stated that it supplied annual level 3 training in safeguarding for registrants who had not been able to access such training elsewhere. Registrants are required to confirm at renewal of registration that they have completed safeguarding training within 3 years. ACP added: 'In addition, Training Schools always insist on Safeguarding Level 3 training and monitor whether the trainee has been provided with this training.'
- 3.6 The Authority noted references to safeguarding in its risk matrix, regarding the risk of clients' harm to others and sexual misconduct by therapists. The ACP highlighted that following a complaint about a registrant, it had published an article in its newsletter drawing registrants attention to difficulties that can arise when members might be asked by the organisation for which they work to see a patient in an inappropriate setting, such as a bedsit.
- 3.7 The ACP highlighted that 'All staff employed by the ACP, including administration, are required to complete safeguarding training, as well as complete DBS clearance. As this is done by the staff taking part in the annual safeguarding training that we provide to members, which is level 3, it means staff have a high level of training'.
- 3.8 The Authority has recently considered Accredited Registers' approach to 'adjunctive therapies': practices performed by registrants in the course of their work that are outside of the registers' explicit scope of practice or competence. ACP highlights on its website that its registrants are qualified to work with children from 0-25 and that when working with clients above that age, or parents of children, other appropriate registration should be held.
- 3.9 The Authority asked if the ACP was aware of other adjunctive therapies practiced by its registrants. The ACP highlighted that its risk matrix noted 'practitioners trained in working with one patient group working with another patient group without a formal training'. The ACP's Ethical Codes 'requires that registrants work within their competence '. The Authority noted this should allow the ACP to consider concerns regarding registrants' practice of adjunctive therapies.
- 3.10 The ACP highlighted that registrants wishing to list adjunctive therapies practiced on their ACP 'Find a Therapist' function must state their registering body for that therapy. The ACP confirmed entries are checked before publication.
- 3.11 The Authority found that 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 The Authority noted that papers from ACP's 2018 Annual General Meeting reported a significant overspend that would 'not be sustainable in the long-term but was felt necessary this year to ensure the development of the new structure and our obligations as a private company limited by guarantee, as well as the ACP's commitment to fight for the continued funding of its training and thus the Treat them Right Campaign'.
- 4.2 The ACP highlighted that it had 'developed a robust business plan for the year ahead that meets our strategic aims and is fully costed to inform the budget.' The Authority noted that its first goal was to 'Protect the public by setting and monitoring standards of training and practice for ACP members as accredited register of the Professional Standards Authority.'
- 4.3 The ACP highlighted a risk to funding of NHS-provided training for Child and Adolescent Psychotherapists by Health Education England, which could affect the profession and sustainability of the register accordingly. The ACP advised that it continued to engage with HEE in line with prioritisation of children and young people's mental health in the NHS Long Term Plan.
- 4.4 As part of its due diligence, the Authority reviewed information including from Companies House and found that 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 The ACP advised it was updating the 'Rules of the Association' to reflect changes since its incorporation in 2015, such as changes to committee structures and the appointment of its Chief Executive Officer role.
- 5.2 The Authority found that this Standard continues to be met.

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 The Authority noted that, when discussing how registrants met CPD requirements the ACP highlighted from its 2018 audit report that from 'the level of learning and teaching provided, the complexity of some of the work and involvement in leadership and publications suggests that child psychotherapists continue to make a significant contribution to the clinical and academic study of child psychotherapy and of child mental health.'
- 6.2 The Authority asked ACP about any further work it had undertaken in the past year relevant to this Standard. The ACP responded:
 1. 'a defined competence framework for qualification, which includes doctoral level research in addition to the clinical competences. In the past year work has been going on to embed these competences into the training standards for all training schools;

2. on-going work in the ACP (Scientific Development Committee) to highlight the relevance of and integration of research into the effective practice of psychoanalytic child psychotherapy, both in training and beyond. This includes work to raise the level of 'research mindedness' of ACP child psychotherapists i.e. their capacity to understand and use research from within and outside of the profession in guiding and promoting their work;
3. the work of the Supported Clinical Networks, supporting effective communication and developing the specialist knowledge bases between members of the profession engaged in specific/specialist areas of work. SCNs also play an important part in the exchange of knowledge and information between the profession and key allied professionals and commissioning bodies;
4. the development of the ACP Events programme aims to include other professions allied to child psychotherapy, where appropriate, so fostering a direct and mutually informed exchange of knowledge and information. Consideration is being given to events which might include the general public.
5. publication of the Journal of Child Psychotherapy is looking to expand readership to reach and communicate with work from other related professions, and to reach an increasingly wide geographical audience.'

6.3 The Authority found that this Standard continues to be met.

Standard 7: governance

- 7.1 At the time of its initial application for accreditation, the ACP had formed, with another register, the Independent Scrutiny and Advisory Committee (ISAAC) to scrutinize the work of the ACP and ensure 'ACP puts the public interest at the heart of its activities'. The work of the ISAAC had been noted in previous annual reviews by the Authority. ACP notified the Authority in 2017 that it aimed to replace this function with a new ACP Board Scrutiny Group composed of the Board's Vice Chair and three lay Non-Executive Directors. The ACP provided terms of reference for the new group highlighting that it would have the same function.
- 7.2 The Authority noted the Scrutiny Group's plans to check ACP's communications with the public including its website as well as ACP's Professional Standards Committee and its Training Council.
- 7.3 The ACP highlighted its establishment of a Diversity and Equality Group which is chaired by the Chair of the ACP. The ACP advised the groups aims were to: 'investigate the impact of the activities of the ACP from the point of view of diversity and equality, and to bring forward proposals to address negative impacts, and to develop ways for the ACP to be an organisation that addresses and is seen actively to address issues of equality and diversity.' The ACP highlighted that its revised Rules of the Association included the objective '*To ensure that child psychotherapy meets the needs of a diverse population and that child psychotherapy is an equal opportunity profession*'.
- 7.4 The Authority asked about the work of ACP's Ethical Practice Group (EPG). ACP advised that it is 'a sub-group of the Professional Standards Committee and has responsibility for overseeing the code of professional conduct and

ethics and managing complaints. The Ethical Practice Group has a balanced number of lay members and child psychotherapists'. The ACP outlined several matters considered recently by the EPG, including issues concerning 'treatment in cases where parents have separated acrimoniously'; ACP's data retention policies regarding complaints; a practice review process for 'less serious breaches of the Professional Code' and annual review recommendations made by the Authority.

- 7.5 The Authority noted that the ACP has between two and four Lay Non-Executive Directors appointed to its Board. Half of the members are required to form a quorum. The Authority asked if a Non-Executive Director was required to be present as part of this. The ACP advised it was not, however stated it would consider whether the quorum should include a Non-Executive Director.
- 7.6 The Authority found that this Standard continues to be met.

Standard 8: setting standards for registrants

- 8.1 The ACP highlighted plans to review its Guidelines on Independent Practice, to support registrants who did not have the same support structures as practitioners working in the NHS or similar environments. The ACP expected this would lead to the development of training and CPD for its registrants.
- 8.2 As with safeguarding issues, discussed at Standard 3, the Authority is considering registers' approach to whistleblowing and the duty of candour. The ACP highlighted that as the majority of registrants are employed in the NHS, local authorities, schools and charities, they would follow their employers' policies. ACP advised that it aimed to develop an internal whistleblowing policy.
- 8.3 The ACP advised that while it encouraged members to be open about mistakes as an informal way of resolving complaints it may need to be more explicit about the duty of candour. The Authority issued a Recommendation for the ACP to consider developing its policy on the duty of candour. (Recommendation 1)
- 8.4 Recent annual reviews of Accredited Registers in talking therapies have considered standards for clinical supervisors, and how concerns about supervisors of registrants are managed. The Authority had noted that ACP planned to introduce 'supervisor associates' so registrants may work with non-ACP supervisors. The Authority asked about whether such supervisors were required to meet ACP standards and how it might address concerns raised about practitioners working as supervisors.
- 8.5 The ACP responded that Supervising Associates will not be qualified ACP registrants but are 'individuals who have been approved as non-ACP supervisors who are able to supervise ACP members and to authorize their annual CPD returns'. They must also have appropriate Disclosure and Barring Service (DBS), or equivalent and must provide details of their registration with an appropriate professional body such as the BPC. Concerns about the supervisor would be received by that professional body, and ACP would recognise any outcomes accordingly. ACP-registered supervisors are subject

to its normal codes and complaints procedures, which could apply to their actions in supervisory roles.

8.6 The Authority found that this Standard continues to be met.

Standard 9: education and training

9.1 The ACP advised it had 'established a project group to review and make recommendations to revise the current pre-clinical standards for child and adolescent psychoanalytic psychotherapy training'. The ACP stated it had developed terms of reference for the project and its intended timeframes for completion.

9.2 The Authority found that this Standard continues to be met.

Standard 10: management of the register

10.1 The ACP advised of plans to add new categories of associate membership, that would not be eligible to appear on its Accredited Register: Assistant Child Psychotherapist Associates; Supervising Associates; and Associates/Friends. The Authority noted that the ACP's register provides explanations of registration status and categories of membership, which should mitigate any risk of confusion between registrants of the Accredited Register and those not on the Accredited Register.

10.2 The ACP had noted in Board minutes that that the majority of its registrants 'were undertaking CPD well above the minimum requirements' however it had also identified through its CPD audit 'a small number of members doing a limited amount of CPD'. The ACP advised the Authority how it addressed this, and enforced its CPD policies including through re-selection for future audits and possible removal from the register.

10.3 The Authority found that this Standard continues to be met.

Standard 11: complaints and concerns handling

11.1 There were no significant changes reported or noted in the past year.

11.2 The ACP reported that in the previous period of accreditation it had received 5 complaints against registrants of which one was currently under investigation and four had not been taken forward. The ACP had received no complaints against itself in the previous accreditation period.

11.3 The ACP advised that at time of assessment by the Authority it was undertaking a review of its Disciplinary Procedures. As part of this review it would implement previous Recommendations and advice provided by the Authority, as well as learning from other sources. The ACP advised that the revised procedures will be considered by its Professional Standards Committee and following approval of its Board be published in July 2019.

11.4 At the previous annual review, the Authority noted that under ACP's Disciplinary Procedures, expelled registrants were able to reapply for registration after two years, while suspensions may be for up to three years. The Authority had considered it appeared illogical for a registrant potentially to be suspended for a longer period than someone who had been expelled and

issued a Recommendation for the ACP to review the length of its sanctions and the length of time before applications to restore registration may be made.

- 11.5 The ACP reported that its EPG agreed that this was potentially unfair and would address this as part of its current review of the procedures. The Authority found that this Recommendation had been considered.
- 11.6 At the previous annual review, the Authority noted that the ACP would provide reasons why applications for restoration had been refused, but not for why applications had been accepted, as they would be in line with the application made. The Authority had noted that in terms of transparency the ACP should record and provide reasons for all final decisions, including those to readmit practitioners to its register and issued a Recommendation to that effect.
- 11.7 The ACP advised it agreed that reasons should be given for the decision and outcome in all cases. This would be implemented as part of its review of the Disciplinary Procedures. The Authority found that this Recommendation had been considered.
- 11.8 Also at the previous annual review the Authority considered the ability of ACP's Registrar or Director of Professional Standards to set aside decisions in response to concerns from a complainant, a person who supplied information dealt with as a deemed complaint, or the involved registrant where there have been particular errors by the panel.. The Authority noted that the Registrar/Director of Professional Standards also had the power to decide that no further action should be taken.
- 11.9 The Authority had considered that it is not transparent or desirable for decisions made by a panel to be overturned by an officer or employee of a register, and that it may be more appropriate for such decisions to be made by an independent panel. The Authority considered this was a serious matter that may affect compliance with Standard 11 if not appropriately addressed. The Authority issued a Recommendation for the ACP to consider whether decisions to set aside complaints outcomes should be made by an independent panel.
- 11.10 The ACP advised: that its Ethical Practice Group had recommended that this power should not lie with one person, but that it should be taken by a panel consisting of a lay member and a child psychotherapist with legal advice as appropriate. This change would be incorporated into ACP's new Disciplinary Procedures. The Authority was satisfied with the ACP's response and found that this Recommendation had been considered.
- 11.11 Previous assessments of the ACP had discussed its approach to 'deemed complaints', the section in ACP's Disciplinary Procedures which allows it to investigate concerns from third parties, or regarding other matters that may suggest a breach of the ACP's codes. The ACP had discussed its first complaint handled under that process and lessons learned from this. As a result it clarified its processes, for example making clear that its remit was for the treatment of clients under 25, and that registrants treating older clients should also hold further registration with an appropriate body. The ACP advised of plans to review this policy, including to remove the term 'deemed' and to develop a better definition of third-party complaints.

- 11.12 The Authority highlighted previous Accreditation decisions issued regarding concerns raised indirectly which stated that it 'would expect a register to consider a complaint under their procedures and to consider whether there is any action they should reasonably take to enable them to assess whether they do have concerns and to assure themselves that it is reasonable not to take action notwithstanding that an allegation is broadly or vaguely stated rather than specific.'
- 11.13 The ACP had been developing its interim suspensions policy and advised this was being considered as part of the review of its Disciplinary Procedure.
- 11.14 The Authority noted that Registrants are required to declare convictions within 7 days and, in line with questions asked to other registers, asked if it was aware how it would manage a declaration of a spent conviction (also noting that they may not be able to process information about these). The ACP advised it was not clear on how it would act in this situation but considered it would undertake an 'assessment as to whether the conviction warrants investigation under the Fitness to Practice Policy'. The Authority advised it was seeking legal clarification on this matter.
- 11.15 The Authority found that this Standard continues to be met. The Authority will check changes to be implemented, including the ACP's updated Disciplinary Procedures, in due course.

Share your experience

- 12.1 The Authority did not receive any responses to the invitation to share experience and did not receive any concerns about the ACP during the accreditation year.

Impact assessment

- 13.1 There were no significant changes reported or noted in the past year.
- 13.2 The Authority took account of the impact of its decision.

Equality duty under the Equality Act 2010

- 14.1 The Authority had regard to its duty under the Equality Act 2010 when considering the application for renewal of accreditation.