

# Accredited Registers Impact Assessment

Accredited Register: **Play Therapy UK (PTUK)**

Type of Review: **Full Renewal**

Period under review: **2024 - 2027**

Date Approved for Panel: **4 October 2024**

## Introduction

Before we make a decision about accreditation, we undertake an impact assessment to understand likely effects on different groups, and the wider health system. We begin to gather the information required for the impact assessment when a Register first applies for accreditation. We consider any changes to impacts when we renew accreditation, and when taking other decisions that affect accreditation status such as imposing Conditions or suspension.

A key part of the impact assessment is consideration of equalities. The Equality Act 2010 imposes a legal duty, the Public Sector Equality Duty on all public bodies to consider the equality impact of its policies and decision making. The duty is known as the Equality Duty and it requires a public authority, in the discharge of its function to consider the following three aspects which form the basis of the duty:

- Consider the impact and eliminate unlawful (direct or indirect) discrimination and any other conduct prohibited under the Equality Act 2010.
- Advance equality of opportunity between people with protected characteristics and those who do not share these characteristics
- Foster good relations between people with protected characteristics and those who do not share these characteristics.

This means that public bodies must consider equality impact on individuals protected under the Equality Act 2010 in carrying out their work. The Authority, therefore, needs to be always mindful of the public duty when carrying out its oversight role which includes the approving of registers. It needs to have 'due regard' to the needs to balance the three aspects which make up the Equality Duty when achieving its goals.

The Equality Impact Assessment is an important tool/mechanism for demonstrating 'due regard' through the consideration of evidence and analysis, actual and potential to identify positive and/or adverse impacts. The key groups we need to consider when making our decisions are, sex, age, ethnicity, disability, religion and belief, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy, and maternity.

## Impacts

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### Equalities impacts - summary

- In general, we cannot overstate the positive impact of PTUK's oversight over the provision of services to a crucial client group in society, children and young people. As PTUK states on its website, "studies indicate that 1 in 5 of our children have some form of psychological problem. The good news is that between 72% and 83% of these children show a positive change as a result of play therapy delivered to PTUK standards, the more severe the problems, the higher the percentage of positive change": [Helping Children – Register of Play and Creative Arts Therapists \(playtherapyregister.org.uk\)](https://www.playtherapyregister.org.uk). PTUK reinforced this point in their response to our queries, when they stated that "PTUK has a strong register of 2,600+ members who are regulated by the PTUK under the PSA's guidance. 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".
- PTUK's Complaints and Concerns procedure is designed to enable a fair and accessible adjudication process. It encompasses lay involvement, an appeals process, and separation of powers and individuals involved in the complaints handling process. PTUK's Assessment, Professional Conduct Hearing, and Appeals panels are all chaired by lay persons, with lay majority in some cases. This should ensure fairness and equality of treatment of all parties in a complaint. The clear, unambiguous policy of PTUK on publication of complaints outcomes and all sanctions should enhance transparency and public protection for all – Standard 5.
- We take cognisance of PTUK's positive response to EDI issues. It has an EDI Policy and a Recruitment Policy that is EDI-sensitive. The policy deals not only with the need to consider EDI in recruitment at all levels, but also to monitor how EDI is embedded in all PTUK processes. We have recommended that EDI training is added to the portfolio of PTUK work on EDI – Standard 5a(4).
- We further commend PTUK for its use of an Independent Audit Assessor to quality assure its complaints and concerns handling process and outcomes. We are informed that this review is conducted annually – Standard 5a(6).
- We note that while PTUK has a risk matrix, it is not clear how often risk is discussed at Board meetings. The risk of suicide or self-harm, especially in relation to its young people, is also missing from its risk matrix. We have, therefore, recommended that PTUK pays greater attention to this and update its risk matrix – Standard 7(1).

### Impacts on groups with protected characteristics

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## Age

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified

## Disability

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified

## Gender reassignment

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified

## Marriage and civil partnership

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified

## Pregnancy and maternity

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified

## Race

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified

## Religion or belief

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified

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## Sex

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified

## Sexual orientation

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified

## Cost and market impacts – summary

- PTUK remains a leading player in the field of play therapy in the UK, and it is recognised as such in the sector.
- Registrant numbers have remained steady and income from membership subscription is certain to be sustained.
- Renewal of accreditation would continue to boost PTUK’s image, credibility, and public protection role for the benefit of children and their families.
- A strong and secure PTUK can only be a good thing for play and creative arts therapy, with members, registrants, service users and the public reap the benefit of a well-resourced and professional organisation.

## Social and environmental impacts – summary

- We note the implications for public protection of PTUK’s stringent membership registration and revalidation processes and procedures, including its use of a Clinical Governance Audit process – Standard 2a(4)
- Again, we note the seriousness with which PTUK takes its safeguarding responsibilities. First, it carries out DBS checks on all applicants and run these through a list of barred or excluded members by other Registers (Standard 2a(5)). Secondly, PTUK has a detailed

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Safeguarding Policy in place. For this reason, it works collaboratively with the Multi-Agency Safeguarding Hub (MASH) and the Local Safeguarding Children's Board (LSCB) – Standard 3a(3).

- PTUK regards the issue of sanctions, including restrictions on practice, as a critical component of its work. For that reason, PTUK displays details of registrants struck-off the Register going back to the last five years – Standard 2b(8). This is helpful for its members, registrants, service users and the public.
- We commend PTUK on its triple-layer process for cross-checking the accuracy of the data they hold, including the involvement of an external process. This is especially helpful for members of the public searching for a therapist – Standard 2b(9).
- In like manner, PTUK's Ethical Framework deals with values, principles and personal qualities. It sets out what registrants must and must not do at all times – Standard 3a(2).
- Worthy of note also is PTUK's approach to restrictions on practice where there are serious safety concerns. PTUK can impose an interim suspension order and temporarily remove registrants from the Register in such situations. The policy stipulates that an order will remain in force until the completion of the complaints process – Standard 5a(7).
- All the evidence points in the direction of PTUK as a well-governed organisation, with clear separation between its various functions. Its key governance processes are all published on its website. It's in good standing with Companies House, all positions have job descriptions, and the Board has its terms of reference. Overall, PTUK has clear and inclusive governance and membership arrangements – Standard 6.

### Decision

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

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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 DBS checks on all applicants and run these through a list of barred or excluded members by other 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 by PTUK's reaccreditation, 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.