

# **A Summary of the Annual Audit of PTUK by the Chair of BCTIWC**

## **October 2017**

A full copy is available on request to the Chair

### **1. Introduction**

This report has been prepared by the Chair of the British Council for Therapeutic Interventions With Children (BCTIWC) for the Professional Standards Authority (PSA) in relation to Play Therapy UK (PTUK) operation during the period December 2016 to October 2017. One of the outcomes of the PSA's revalidation of PTUK's Accredited Register (AR) was a condition '*I. PTUK must strengthen the effectiveness of its governance to ensure scrutiny of all functions of PTUK relating to the register. PTUK's oversight body, the BCTIWC, must demonstrate its independence and impartiality. As part of this, the Annual Report of the BCTIWC must provide substantial evidence of the scrutiny it has carried out. PTUK must present this evidence at the next annual review of accreditation.*

Due to the loss of the then Chair of the BCTIWC in December 2016 a new one was appointed who needed time for familiarisation with the situation. A list of points to be included in an annual audit report was drawn up and agreed with the PSA. It was also agreed that the report must be submitted by October 2017. This report is the first to be prepared on this basis. As such the preparation has been a considerable learning experience for the BCTIWC and PTUK. Drafts have been reviewed by other members of the Council.

### **2. Executive Summary**

- 2.1. The main methods used to compile this report have been: spot and sample checks of procedures and systems in PTUK's Uckfield main office; interviews with PTUK's Directors, registrants, office staff and Course Directors of the accredited training organisation (APAC), inspection of a sample of advertising material and email correspondence and formal review by Council of PTUK's proposed changes to their competency frameworks.
- 2.2. The procedures used to manage the Accredited Register of Play and Creative Arts Therapists were observed to be working correctly including the removal of registrants from the register. (Ref: 3.3 Registrant Removal below)
- 2.3. Chair concerns were raised that the annual revalidation of all registrants takes several months to complete. PTUK have responded that the main reason is that all applications are reviewed, not just a sample, in some detail to manage safety of practice, service evaluation and information upon which improvement of practice may take place in line with Right Touch Regulation principles. It is not thought that this delay poses a risk to the public. PTUK has accepted the Council's recommendation that face to face training on the use of the Caerus2017 software is required. (Ref: 3.2 Registrant revalidation below)
- 2.4. There were no formal complaints received about registrants, PTUK or its accredited training provider in this period.
- 2.5. Council approved PTUK's new competencies required for the use of touch in therapy with children. (Ref: 5.1 PTUK Competency framework – new standards below)
- 2.6. The operation of PTUK security procedures covering premises, systems, data and personnel have been inspected as being satisfactory. (Ref: 6 Security below)
- 2.7. Sample checks have been made on communications with the public, registrants and other professional organisations. With one exception, Council considered these to be

satisfactory. The exception concerned a registrant who had apparently ignored detailed answers given by the Registrar in a previous email. The Registrar responded in a forthright manner which the Council considered to be inappropriate. The Registrar has undertaken not to use the same words again. (Ref: 7 Communications below)

- 2.8. Policy reviews. The policy for re-registering former registrants has been reviewed and approved. The review, already in progress, of the data protection policies for PTUK and model policies for registrants and their employers covering the new GDPR requirements has been completed. The programme for the review of other policies has been updated to a more realistic time scale. (Ref: 8 Policies below)
- 2.9. Financial. Although it is not the Council's responsibility to audit or advise upon PTUK's financial management but to comment on any aspects that that might be seen as a conflict of interest or reduce protection of the public. PTUK has provided financial accounts, budgets, and cash position. All considered as being satisfactory. (Ref: 9 Financial below)
- 2.10. Staff. PTUK's staff situation and the changes being made have been reviewed as satisfactory. (Ref: 10 Human relations below)

### **3 Registrant Matters**

#### **3.1 Registrant registration**

##### **Annual random check on recently approved registrants as meeting the standards for admission.**

Chair visited the PTUK office on 26.09.17 to conduct the annual audit using a random sample of 20 registrants checking that their qualifications are recorded correctly. Chair confirms that all 20 registrants were correctly and clearly documented. For all 20 registrants the certificates listed matched the qualifications and all was in order. The titles agreed with those on the register.

#### **3.2 Registrant revalidation**

Chair is concerned that registration of all registrants takes many months to complete. Reasons for late completion are varied but from the data, emails and conversations, Chair believes that the primary cause is due to registrants having clerical problems with using Caerus.

### **PTUK RESPONSE JT**

There are three main factors:

Registrants being late in sending in their applications

A minority of registrants having difficulties with Caerus (Excel version) exacerbated by leaving data entry until the last minute

The time that PTUK's staff need to check all, not a sample, of applications

However, the time has been reduced as compared to the former manual data entry from hard copy forms.

Chair suggested that some of these problems with re-registering could be avoided if successful use of Caerus was an integral part of every training course, even at the higher levels of each qualification.

### **PTUK RESPONSE MJ**

There is plenty of support, the problem is that many don't take re registration seriously.

## **PTUK RESPONSE JT**

A new (Caerus2017) system has been introduced (May 2017) to our registrants. This is a comprehensive therapy records management system based on database technology that should last for the remainder of a registrant's career. Although part of the data is submitted to PTUK for revalidation, this a by-product of the system. Most of the data items are not exported to PTUK. Caerus2017 has been designed to make compliance with the new data protection legislation (GDPR) coming into force in May 2018 much easier compared to paper based methods.

Data entry is by means of forms, rather than tables, which has enabled better quality control and should be simpler and more efficient for registrants. It also has referential integrity to protect the deletion causing 'orphan records'. Caerus2017 integrates with Microsoft Word, Excel and Powerpoint.

It is hoped that the majority of registrants will convert from the Excel version of Caerus, which is essentially a method for collecting data on an annual basis for revalidation. However, our experience so far, that despite extensive context help pages for each form, some registrants will need face to face training. This is starting to take place on the APAC Certificate and Diploma courses, including Course Directors themselves. It is also planned to offer one-day training courses starting January 2018 for qualified registrants.

Chair believes that using Caerus and registering using Caerus during the course should be an integral part of the portfolio, with support if needed.

Another way of achieving more students completing the process on time would be to use the supervisors in this process. Chair is aware that their role is to support therapists in their role with clients but perhaps PTUK supervisors could offer a one group session for support with on line re-registration, in perhaps, December/January, making it an end of year/start of year meeting maybe with some social element to the session? If registrants brought their own portable devices, there should not be a problem with anonymised data. Also, the Local Groups could offer a similar session. Chair believes that Peer support and encouragement are beneficial and it would be a learning opportunity with many problems minimised. The supervisors need to be competent themselves using Caerus and may need training to do this.

## **PTUK RESPONSE MJ**

Supervisors already do this.

## **PTUK RESPONSE JT**

However this point is taken. Training as above will also be offered to Accredited Supervisors as above.

Chair sees that there are no incentives for registrants to comply with deadlines, neither are there penalties for those who take many months. Chair suggested an increase could be made in the cost of registration, for example, to £110, with a prompt payment reduction to £90 for the form correctly submitted with payment by 1 February. Registrants would have January to submit their form and payment, with IT support from office staff when needed. If payment and the form is submitted correctly during February and April, for example, the cost could be £100, with the fee of £110 applying only to registrants who submit payment and the form after April 30. A designated person in the office should have power to negotiate when a genuine query emerges. Chair believes the need is to improve efficiency in the process, not to punish.

## **PTUK RESPONSE JT**

The Executive Board does not want to introduce an incentivised scheme this year because it is proposed to raise each fee by £10 this year. It is also felt that during 2018 registrants need time to become more familiar with Caerus2017. Also it is felt that if a registrant doesn't value the Register sufficiently to revalidate on time, they shouldn't be on it.

In conclusion Chair does not think that the length of time for the process of registration is potentially harmful or dangerous for the public who are using the register, but it is tedious and time consuming for the PTUK office staff over many months and a more efficient re-registration would be helpful to all.

## **PTUK RESPONSE JT**

PTUK is trying to balance the gathering of a satisfactory set of data for service evaluation (quality assurance), assessment of fitness to practice and data that indicates areas for improvement of practice for the profession, with efficient use of resources. The process of automating the processes is proceeding in stages. It will be some years before the development is completed. PTUK, a relatively small professional organisation, is pioneering a major advance in information management in the therapy professions.

Every effort is made to ensure that records are kept up to date with what is happening with registrants who need to complete the registration process. On checking it was found that therapists are taken off the register when they decide they are no longer practicing and become non practising members.

Supplying session data is optional after registrants have completed training. Chair checked the register available to the public and in a random sample of those registrants who had not provided session data it was clear they were not discriminated against or penalised in any way.

### **3.3 Registrant removal**

Chair was able to see that registrants enquiring about leaving the register are given advice about the advantages of re-registering or other options such as becoming a non-practising member in a friendly yet professional tone. The 6 registrants Chair saw who wished to be taken off the register were removed and she checked the register available to the public later that week from her home and none of those therapists were on the PTUK register.

## **4 Complaints**

### **4.1 Complaints against registrants**

None

### **4.2 Complaints against PTUK**

None

### **4.3 Complaints against training providers**

None

## **5 Competency framework - the basis of the register: standards, grades/titles, training and quality assurance**

### **5.1 PTUK Competency framework – new standards**

Before the BCTIWC meeting held on Thursday 28 September 2017 the Discussion Paper: “Competencies required for the use of Touch” was circulated to members. At the meeting following discussion the text of the document was agreed, as being fit for purpose. It was also suggested that experienced registrants should be invited to develop one-day CPD workshops on the subject to be accredited by PTUK.

### **5.2 PTUK Competency framework – revision of existing standards**

None

### **5.3 PTUK grades/titles**

In 2014 PTUK applied to the PSA for validation for a course with the draft title of 'Counsellor for Children and Young People using the Creative Arts'. The title approved by the PSA is 'Play and Creative Arts Counsellor for CYP. BCTIWC members met June 6th 2014 at the request of PTUK to scrutinise the clinical aspects of the programme and make recommendations. Overall the panel took the view that “the course was well thought out and should provide a useful adjunct to the play therapists’ tool kit.”

At the end of 2016 PTUK made a reapplication for the course to the PSA entitled “Counsellor for CYP Using the Creative Arts” (draft title). After the November 3<sup>rd</sup> 2016 meeting “assurance was received and accepted by all Council members that the practice standards for the programme was in accord with those previously approved in 2014 and the Council was happy to approve.” This course was approved in January 2017 entitled “Counselling Children and Young People using the Creative Arts.” The title on the register was approved by the PSA as above.

## **6 Security**

Chair visited the PTUK office to conduct an audit. Whilst there, security systems were examined. Staff were unaware that this would happen therefore Chair was viewing normal practice. Chair looked into the security systems in place. Her background was Special Needs Education so findings were from a lay perspective and concentrated on what was sensible and reasonable.

### **6.1 Security of systems**

Chair believes that security is of paramount importance and every effort is made to ensure it.

### **6.2 Security of procedures**

Chair examined the record book of the checks that are conducted at the end of every month. There was evidence that the smoke alarms in each room are tested each month and that the fire extinguishers are checked and are in the correct position. Also emergency exits are checked to ensure that they are clear and that the green lights above the emergency exits are working. Chair observed that the information is logged every month and any problems noted. Common problems appeared to be power cuts and a build-up of cardboard.

Chair thought that the record book of the checks being done, was a good reminder for staff for the checks to be made each month and it showed a good record of the detailed and regular checks that are made.

### **6.3 Security of premises**

Chair could see that all aspects of the security of the premises are taken seriously by all staff.

### **6.4 Security of personnel**

Chair thinks that security of personnel is taken seriously and that the procedures put in place are adhered to and that if there was a concern by any of the staff about their security either recently or in the future that they would be able to raise it and be listened to and have action taken if it were deemed necessary.

### **6.5 Security of data / data protection**

Chair understands that it is necessary that personal information is collected about the registrants, Chair is confident that should there be any questions that needed to be answered about a registrant at some time in the future and a request for information was made that information would be available and accessible and is kept securely.

Chair believes that the staff of the PTUK office take security of data and data protection seriously and that the agreements that the staff sign are useful for staff to know and follow. Also knowing that payment details are not held on the system nor to be put in writing, or repeated back makes it a simpler process for staff to administer.

## **7 Communications**

### **7.1 Communications – registrants**

Chair looked at a random sample of emails sent out by the PTUK office and by the directors to individual registrants and concluded that this is a professional, organisation that has built on past experience and all the email communications seen with registrants is helpful, clear and courteous. The PTUK office appears to be efficient and well-run. The ethos of the office and the directors is geared towards supporting and helping registrants. There is no need for any changes based on the findings of the visit on 27.01.2017.

### **7.2 Communications – prof. organisations**

MJ has advised that contact is made every three months with the Chair of BAPT and that a senior official of UKCP is visiting PTUK's London office in September. Chair has seen a random selection of emails sent to a variety of individuals within The Birmingham Centre for Arts Therapies working towards collaboration between the 2 organisations. All emails seen were professional and to the point, yet friendly in tone.

### **7.3 Communications – public**

PTUK rarely has communications with public. In the majority of cases they are referred to the register.

### **7.4 Communications – marketing public (advertising)**

Chair has seen many examples of advertising for marketing purposes, both in publications and before being submitted for publication. Chair believes that the wording and suggestions given were appropriate and thought provoking and could not see anything that would offend the public interest. Its use was appropriate for the intended market.

## **7.5 Communications – marketing individuals (email)**

Chair has seen many marketing items sent to registrants. It was all informative, clear and written in a friendly style. There was no conflict of interest.

## **7.6 Communications – other**

JT and MJ have hundreds of email conversations with various people. Only 2 that chair has seen gave any cause for concern.

## **7.7 Public consultations**

Chair has been informed that a consultation with PTUK members will be held about the need for raising the fees for re-validation.

# **8 Policies**

Ensure all new draft policies are reviewed by Council before being approved.

## **8.1 Policies – new**

### **Re-registering as a Member**

This policy was drafted after concern was raised during the March 2017 meeting of BCTIWC about registrants needing to know the consequences of not re-registering. It gave a structure for registrants who for a variety of reasons had not renewed their membership and have had a time away from practice and regular supervision for more than a year. This document was a collaborative work, drafted, then sent to Council members who read it, made comments and helped with redrafting and finally accepted the policy.

## **8.2 Policy revisions/updating**

JT/MJ ensure all proposed revisions of policies are reviewed by Council before being approved and BCTIWC has been given a list of policies and the dates when they are due to be updated/revised.

The workload involved by the Council and PTUK on other priorities has meant that the review of all the existing policies, as originally planned, has been delayed. It is proposed that a five year review cycle should be used.

### **8.2.1 PTUK Data Protection Policy**

The draft new Data Protection Policies to meet the forthcoming GDPR requirements for PTUK and for registrants, together with a check list to assess that their employing organisations' policies are suitable were reviewed by Council on Thursday March 17<sup>th</sup> 2016 and are in place. It is recorded in the Minutes of the BCTIWC Meeting held on Thursday November 3<sup>rd</sup> 2016 that JT gave an update to Council members about PTUK Data Protection Policy that the accredited training provider APAC has introduced revised sessions on data protection.

Chair knows that JT has developed a Data Protection Policy template for therapists to use if the school or organisation does not have one. This is available to current registrants using ALMS (APAC Learning Management System).

### **8.3 Other policies**

#### **8.3.1 Fitness to Practise**

This policy will now be reviewed by March 2018

#### **8.3.2 DBS policy for registrants**

This policy will now be reviewed by October 2018. It is considered that no major changes will be required to the existing policy.

#### **8.1.3 Professional indemnity cover for registrants.**

This policy will now be reviewed by March 2019. It is considered that no major changes will be required to the existing policy.

## **9 Financial**

It is not the Council's responsibility to audit or advise upon PTUK's financial management but to comment on any aspects that that might be seen as a conflict of interest or reduce protection of the public.

### **9.1 Financial – budgets**

Chair was sent the unaudited financial statements for the year ending 31 December 2016 which were approved and authorised by the Directors on 17 September 2017. It showed a very healthy financial position and an increase in revenue from the preceding year.

### **9.2 Financial – cash position**

Chair thought the cash position appeared healthy and suitable for working purposes.

### **9.3 Financial – profit and re-investment**

Chair believes the healthy financial position will allow for the continued re-investment in [PTUK](#) that is needed for the future plans and ambitions of the [organisation](#). These are well documented on the web-site and there is no financial reason why they should not be realised.

## **10 Human relations**

### **10.1 Staff – establishment**

The previous and current Chair have noted that the PTUK office staff in the past had been a consistent team for nine years and some had been working in the office longer. But in the past 6 months 2 long serving members and 2 recent employees of less than 8 months service have terminated their contracts of their own accord. There did not appear to be major problems dealing with the work load with the reduced staff available but Chair could see that efforts were going to be made to recruit and train staff for the workload in the office.

Chair was invited to the Course Directors meeting on 10 June 2017 led by MJ. Her management style was pleasant, inclusive and professional. The long agenda was effectively time managed with an agreed finishing time. Course Directors were encouraged to contribute their suggestions, MJ explained the role of office staff and the need to work with them.

Later the Course Directors and the chair enjoyed a meal together at a hotel with MJ and JT. The atmosphere was friendly and open and at this meal Monika and Jeff thanked everyone for their work during the year, and said a particular good bye to one Course Director who was leaving after 10 years of work.

#### **10.2 Staff – termination**

None

#### **10.3 Staff – remuneration**

Chair has seen the interactions of the staff of PTUK office and the Directors working together and is satisfied that if remuneration is a problem in the recruitment and retention of staff this would be amicably discussed and rectified.

### **PTUK RESPONSE MJ**

Action would be taken where agreed.

#### **10.4 Staff – development**

Nothing to report.

#### **10.5 Staff – succession plan**

Chair was told that a succession plan is in place.

### **PTUK RESPONSE JT**

The succession of the Executive Board is strictly confidential at the present time.

## **11 Corporate governance**

### **PTUK RESPONSE JT**

Nothing exceptional to report.

#### **11.1 Constitution – changes**

None

#### **11.2 Shareholdings and dividends**

### **PTUK RESPONSE JT**

No changes – no dividends paid.

#### **11.3 Consultations with members**

None

## **12 Other Miscellaneous Activities**

### **PTUK Conference, Wentworth College, Barnsley 10 June 2017**

Chair attended this conference. There had also been a conference in Santiago De Compostelo 27/28 May. Delegates were enthusiastic and attentive. All of the 3 workshops were well led and informative.

The evaluation sheets provided allowed delegates to feed back any comments and concerns. This enables those arranging the conference to see the strengths and weaknesses of the workshops and the conference as a whole including the venue and food etc.

In conclusion Chair could see that the conference was well planned drawing on past experience of previous conferences and on the needs and wishes of delegates who pay to attend. If this was not the case registrants would not attend or if they did there would be an atmosphere of moaning and discontent. This was certainly not the case. Chair spent the day talking and mixing with the delegates and did not hear any negative remarks. The atmosphere from the delegates was positive throughout the day.