

# Initial Accreditation Report

Institute of Trichologists (IOT)

14 December 2023

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# The Process

The Professional Standards Authority (the PSA) 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 Accreditation Panel decides whether to accredit an organisation or not. They can also decide to accredit with Conditions and issue Recommendations to the organisation.

- **Condition** – Issued when an Accreditation 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 Accredited Register, but which is not a current requirement for accreditation to be maintained.

This assessment was carried out against the *Standards for Accredited Registers (April 2016)*<sup>1</sup> and the new Standard One introduced in 2021 by the PSA and which includes the ‘public interest test’. Standard One checks eligibility under our legislation, and whether accreditation is in the public interest. More about how we assess registers against Standard One can be found in our Supplementary Guidance for Standard One<sup>2</sup>.

We used the following in our assessment of the IOT:

- Review of evidence for the benefits and risks supplied by the IOT and gathered through desk research.
- Documentary review of evidence supplied by the IOT and gathered from public sources such as its website.
- Due diligence checks.
- Share your experience responses.
- Site visits including discussions with members of staff.
- Interviews with the IOT Chair, Chair of Ethics Committee, Education Director and Education Manager.
- Observation of an IOT Board meeting on 6 September 2021.
- Assessment of the IOT’s complaints procedures.

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<sup>1</sup> [https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/standards-for-accredited-registers-2016.pdf?sfvrsn=cfae4820\\_4](https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/standards-for-accredited-registers-2016.pdf?sfvrsn=cfae4820_4)

<sup>2</sup> [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](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 17 November 2023 to consider the IOT's application for accreditation of its register. The Accreditation Panel was satisfied that the IOT could meet with Conditions all the [Standards for Accredited Registers](#). **We therefore decided to accredit the IOT with Conditions.**

This followed an initial Accreditation Panel meeting on 10 August 2022 where the Accreditation Panel found that Standard Four was met and that Standards One, Six and Eight were met with Conditions. The Accreditation Panel was not satisfied that Standards Two, Three, Five, Seven, Nine, Ten and Eleven were met and decided that accreditation could not be granted without some further actions being taken by the IOT to address those areas. The Accreditation Panel decided to adjourn the meeting to allow the IOT time to complete the following actions:

	<b>Action</b>	<b>Standard(s)</b>
One	<p>The IOT should create clearer separation between governance and oversight of its membership functions, and that of its Register to reduce the risk of actual, or perceived conflicts of interest in its governance arrangements. The arrangements should ensure that:</p> <p>a) The running of the register is not financed by product endorsements or similar income streams.</p> <p>b) Decisions relating to public interest, including on registration and complaints, are overseen by governance groups that are not also involved in financial or membership interests.</p> <p>c) Decisions relating to registration or complaints against registrants should not require ratification from the Board.</p> <p>The IOT should put as much into place as possible within the six-month timeframe. If anything is not achievable within this timeframe the IOT must provide a clear plan of how it will implement the required changes. The plan should include timelines for the implementation of the changes.</p>	2, 5 and 7
Two	<p>The IOT should ensure there is appropriate lay involvement in the governance bodies with responsibility for decisions about the Register including complaints. This could include people with lived experience as a service user of trichology as well as those with relevant experience such as in regulation and finance</p>	2, 5, 7 and 11
Three	<p>The IOT should set out the curricula for its course, to demonstrate:</p> <p>a) how this is a mitigation for risks identified in the risk matrix</p>	3, 9 and 10

	b) how this equips its registrants to practise specialisms listed on the register such as expert legal witnesses and working with Afro-Caribbean hair.	
Four	The IOT should assure itself that information on its register about registrants' grades, and specialisms is accurate. The IOT should provide clear information about what is required for each grade of membership, including how the mentorship process works. The IOT should explain its processes for assuring itself that people are qualified to list specialisms on the register.	9 and 10
Five	The IOT should review its decision making with regard to complaints. Decision makers at different stages of the process including appeal should not have previously been involved in the complaint. The IOT should review the people who are involved in the complaints procedure to ensure there is separation between investigations, adjudication and appeals and that there is appropriate lay involvement in making the decisions.	7 and 11
Six	<p>The IOT should review and update its complaints and disciplinary procedures so that it is clear how the IOT will deal with different types of concerns. The IOT should consider:</p> <p>a) The test it will apply, whether 'no case to answer' or 'realistic prospect' is clear.</p> <p>b) The criteria and process for escalating complaints from informal to formal so it is clear to the public.</p> <p>c) Information about support that is offered to complainants and other witnesses throughout the process.</p> <p>d) Make clear who is informed of the outcomes and whose responsibility it is.</p> <p>e) Provide information about what happens following an agreed outcome if the registrant is non-compliant.</p> <p>f) Provide information about the publication of interim suspension orders.</p> <p>g) Review the timeframe in which complaints can be considered and whether complaints outside of this timeframe will be considered if it is in the public interest.</p> <p>h) The ability for the complainant to appeal an outcome.</p> <p>There should also be clear information about potential sanctions, and how these will be published. There should be a range of sanctions available to disciplinary Panels so that registrants can be held to account in a fair and proportionate way. Sanctions should be published for at least the period of sanction, and removals from the</p>	11

	register should be published for a reasonable timeframe. Any sanctions should be visible from the Register entry.	
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The IOT provided evidence of how it had responded to the Actions above, as well as to some of the Conditions the Accreditation Panel had been minded to issue should accreditation be granted. The Accreditation Panel reconvened on 17 November 2023 to consider this evidence. The Accreditation Panel was satisfied that Actions One to Four had been fully addressed. Actions Five and Six had been partially met but the Accreditation Panel noted some gaps which could be addressed through Conditions. The Accreditation Panel therefore decided that Standards Three, Four, Six, Nine and Ten were met and that Standards One, Seven, Eight and Eleven were met with Conditions. The Conditions noted under Standard Eleven also impact on Standards two and five.

We noted the following <b>positive findings</b> :	
<ul style="list-style-type: none"> <li>The IOT has made significant changes since its initial accreditation Panel meeting to meet our Standards, including putting new governance structures in place, updating its complaints procedure and changing its approach to listing specialisms on its register.</li> </ul>	

We issued the following Conditions to be implemented by the deadline given:

<b>Conditions</b>		<b>Deadline</b>
<b>Standard 1</b>	1. The IOT must review the information it provides on its website for the public about the evidence that is available about trichology. The IOT should be clear about the limitations of the evidence currently available.	Next Assessment
<b>Standard 7</b>	2. The IOT should ensure that all members of its Board and Committees are equipped to make fair, consistent, and transparent decisions. The IOT should consider mechanisms such as appraisals for monitoring the ongoing competence of its Board and committee members and consider induction training and ongoing training in areas such as equality and diversity, data handling and decision making in disciplinary procedures for key decision makers.	Next Assessment
<b>Standard 7</b>	3. The IOT should explore options for informing and involving the public and service users in what they do and provide an update of progress at the next review of accreditation.	Next Assessment
<b>Standard 8</b>	4. The IOT should review and update its Code of Professional Practice and Ethics to ensure greater clarity over its requirements for its registrants. They should be clear what is a requirement and therefore something that a	Next Assessment

	registrant is held to account to and what is guidance.	
	5. The IOT should review how it communicates its CPD requirements on its register and ensure that it has appropriate mechanisms in place to check that its registrants are complying with the requirement.	
<b>Standard 11</b>	6. The IOT should develop and publish its organisational complaints policy	Next Assessment
<b>Standard 11</b>	7. The IOT should review its appeals process for complaints outcomes to ensure that it is clear to all parties what the process is. Decision makers must not have previously been involved in the complaint. The IOT should review and update its procedures to ensure there is appropriate separation for appeals.	3 months from publication
<b>Standard 11</b>	8. The IOT should: <ul style="list-style-type: none"> <li>a) review and update its Complaints handling policies and procedures to ensure consistency between the different documents.</li> <li>b) develop its processes to ensure that they are clear about appeals, interim orders and other technical aspects as highlighted by the Accreditation Team.</li> </ul>	3 months from publication

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

<b>Recommendations</b>	
<b>Standard 1</b>	<ol style="list-style-type: none"> <li>1. The IOT should provide clear information on its register that accreditation with the Authority falls under the remit of the UK only. Only those registrants within the UK can use the Quality Mark and the IOT should develop mechanisms to monitor this.</li> <li>2. The IOT should continue to develop clear and objective evidence that users derive benefit from the activities practised by registrants.</li> </ol>
<b>Standard 3</b>	<ol style="list-style-type: none"> <li>3. The IOT should <ul style="list-style-type: none"> <li>a) review and update its risk matrix to ensure that it fully covers all the risks involved in practice, including poor hygiene, adjunctive therapies, poor record keeping, inappropriate business premises and practising without insurance. The IOT should ensure that all relevant controls are considered.</li> <li>b) The IOT must develop its risk management processes to include processes for the identification and monitoring of risks. The IOT should consider maintaining a formal risk register (such as the matrix submitted as part of its</li> </ul> </li> </ol>

	application for accreditation) as a tool to record, assess and manage risks.
<b>Standard 5</b>	4. The IOT should develop its business continuity plans and consider succession planning.
<b>Standard 7</b>	5. The IOT should review its website, policies, standards, and guidance documents to ensure they are accessible to service users and consider where 'easy read' formats might be useful. 6. The IOT should develop and publish Terms of Reference for the Registration Committee and the Independent Ethics Committee.
<b>Standard 8</b>	7. The IOT should continue to develop its guidance for its registrants on safe use of products and equipment. As part of this the IOT should consider if it should develop further guidance for its registrants on safe premises and should review the risks in its risk matrix to see if there are any other areas where its registrants would benefit from additional guidance. 8. The IOT should consider developing a formal policy for handling revisions and updates that are outside its schedule.
<b>Standard 10</b>	9. The IOT should consider providing links to other organisations such as regulators or other Accredited Registers that registrants may belong to. This will help facilitate routes of complaint for service users. 10. The IOT should update the information on its website to make clear what its registration requirements are for the public. 11. The IOT should review its published processes for registration and renewal, to ensure that it includes information on the decision. 12. The IOT should develop of policy for handling positive declarations received during the registration/renewal processes. 13. The IOT should develop systems to check outcomes from other relevant bodies for registrants who have dual membership, such as with a statutory regulator. This could include highlighting regulators on registrants' individual profiles and including checks of the regulators when conducting spot-checks of registrants. 14. The IOT should develop a restoration policy which makes clear when it can readmit eligible members to the register who have been removed following a disciplinary case, where appropriate. This could form part of the restoration policy, or it could be linked to the lifting of sanctions. 15. The IOT registration appeals policy appears to have multiple right of appeal. The IOT should review this policy.
<b>Standard 11</b>	16. The IOT should document its processes for considering sanctions and complaints outcomes from other bodies.



	<ol style="list-style-type: none"><li>17. The IOT should ensure that the support it offers to complainants is explicit on its website.</li><li>18. The IOT should update its safeguarding policy to ensure it is clear what actions the safeguarding lead will take and when they will escalate, and report concerns to the appropriate authorities.</li><li>19. The IOT should document its policy for advising relevant bodies (for example another Accredited Register) in the event of a concern being raised that might involve a breach of that body's codes.</li></ol>
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The following report provides detail supporting this outcome.

# The Register

This section provides an overview of the IOT and its register.

<p><b>Type of Organisation</b></p>	<p>Limited company, registered with Companies House 00208098</p>
<p><b>Overview of Governance</b></p>	<p>The IOT's governance arrangements are published on its <a href="#">website</a>. The IOT's <a href="#">Board of Governors</a> oversees the 'running of the IOT clinic, research opportunities[sic], seminars, conferences, guidance and product recommendation.'</p> <p>The Registration Committee (RC) oversees the register. The RC will make decisions on registration and the structure of the register. The activities of the RC and therefore the register are funded through registration fees and not reliant on product endorsements or other similar income streams. The RC consists of one trichologist and four lay people with experience in areas such as human resources, management, employment law, employee relations, counselling, health care, education, and leadership.</p> <p>The Independent Ethics Committee (IEC) 'deal with informal and formal complaints of a nature that is not considered critical or that may endanger patients or members of the public. Complaints that are deemed 'critical or that may endanger patients or members of the public' are escalated to the Registration Council (RC) who have clear guidelines on disciplinary procedures.' The IEC consists of three lay people with experience in areas such as mediation, dispute resolution, regulation and finance.</p>
<p><b>Overview of the aims of the register</b></p>	<p>The IOT publishes its Mission and Vision on its <a href="#">website</a>.</p> <p>'The Institute of Trichologists are widely recognised as regulators and standard setters for the Trichology industry in the UK, the trusted point of access for the public seeing information about the Practice of Trichology, and where appropriate being able to raise concerns about Registered Members. The Institute of Trichologists places public protection and patient safety at the forefront of all of its activities.</p> <p>The Institute of Trichologists' Member Registrants and associated Education Providers are accredited and endorsed by the Institute of Trichologists as meeting the highest standards of quality. All parties that are admitted to the Institute of Trichologists Registers have met the agreed industry qualifications and abide by the strict</p>

	code of Professional Conduct and Ethical practice as determined by the Institute of Trichologists.’  This webpage also contains the IOT’s values, the first of which states ‘Upholding Patient Safety and Public Confidence at the core of all activities carried out by the Institute of Trichologists.’ There is also a statement on its public protection role.
<b>Register Website</b>	<a href="https://trichologists.org.uk/">https://trichologists.org.uk/</a>
<b>UK countries in which Register operates</b>	England, Scotland, Wales and Northern Ireland. The IOT also hold a register for international registrants, separate to its Accredited Register.
<b>Role(s) covered</b>	Trichologist
<b>Number of registrants</b>	As of March 2022, there were 130 registrants on the UK register
<b>Main practice settings</b>	Registrants typically work in private practice.
<b>About the patients and service users</b>	Service users will include adults and children, people from different ethnic group and those who may be suffering long term health conditions.

### Inherent risks of the practice

This section uses the criteria developed as part of the PSA’s *Right Touch Assurance tool*<sup>3</sup> to give an overview of the work of the practitioners on the IOT register.

<b>Risk criteria</b>	<b>Trichologists</b>
<p><b>1. Scale of risk associated with Trichologists</b></p> <p><i>a. What do they do?</i></p> <p><i>b. How many are there?</i></p> <p><i>c. Where do they work?</i></p> <p><i>d. Size of actual/potential</i></p>	<p>a) The IOT describe Trichology as ‘the science of the structure, function and diseases of the human hair’ and clinical trichology as ‘the diagnosis and treatment of diseases and disorders of the human hair and scalp.’ Trichologists seek to help clients with a range of hair and scalp conditions including female and male pattern hair loss and the symptoms of alopecia areata. A list of hair conditions is presented on the IOT’s website. Trichologists will diagnose conditions of the hair and scalp, offer treatment that falls within their area of competence and refer to other health professionals if further tests such as biopsy or prescribed medications are needed.</p> <p>b) As of January 2021, there were 196 Trichologists on the IOT’s register this includes 43 student members who are not fully qualified practicing Trichologists until they pass the</p>

<sup>3</sup> [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](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><i>service user group</i></p>	<p>course and graduate and 17 non-UK based registrants. The IOT estimate that there are approximately 165 practising trichologists in the UK, so it registers around 79% of the workforce.</p> <p>c) The register covers England, Scotland, Wales and Northern Ireland. Trichologists on the IOT's register operate in private practice. There is also a register for international members, this however falls outside the remit of accreditation.</p> <p>d) The IOT estimate that there are currently 8,000 women and 7,000 men in the UK suffering with hair and scalp conditions in the UK. The IOT cited National Institute for Health and Care Excellence (NICE) as the source of this data but did not provide a reference and the team were unable to locate it.</p>
<p><b>2. Means of assurance</b></p>	<p>As noted above the majority of the IOT's registrants work in private practice and so may not be subject to employer checks such as criminal records checks. The IOT has indicated that some of its registrants may be registered with the General Medical Council (GMC) and as such would be subject to its registration requirements. Other than this small group, Trichologists are unable to prescribe medications and would need to refer onto other healthcare practitioners if they thought that a medicated treatment was necessary.</p>
<p><b>3. About the sector in which Trichologists operate</b></p>	<p>We reviewed the NHS website's page on hair loss which advises that patients should see their GP for certain symptoms such as sudden hair loss, the development of bald patches, losing hair in clumps or a burning or itchy scalp. This page highlights the importance of seeing a GP to find out what is causing the hair loss before seeing a commercial hair clinic.</p>
<p><b>4. Risk perception</b></p> <ul style="list-style-type: none"> <li>• <i>Need for public confidence in Trichologists?</i></li> <li>• <i>Need for assurance for employers or other stakeholders?</i></li> </ul>	<p>As self-referral is a pathway to seeing a Trichologist, it is important that the public have confidence in the practitioner they are seeing.</p> <p>Trichologists will refer clients to others in the medical community such as GP's if they think further tests are needed such as biopsy or if the treatments need to be prescribed. It is therefore important that people in the wider medical community have assurance about the Trichologists.</p>

# Assessment against the Standards

## Standard 1 – Eligibility and public interest

### Summary

The Accreditation Panel found that Standard One is met with a Condition. We issued the following Condition:

**Condition One** - The IOT must review the information it provides on its website for the public about the evidence that is available about trichology. The IOT should be clear about the limitations of the evidence currently available.

We issued the following Recommendations:

1. The IOT should provide clear information on its register that accreditation with the Authority falls under the remit of the UK only. Only those registrants within the UK may use the Quality Mark and the IOT should develop mechanisms to monitor this.
2. The IOT should continue to develop clear and objective evidence that users derive benefit from the activities practised by registrants.

### The Accreditation Panel's findings

#### *Accreditation Panel meeting 10 August 2022*

The PSA's powers of accreditation are set out in the National Health Service Reform and Health Care Professions Act 2002. Standard One considers whether a Register is eligible for accreditation, based on whether the role(s) it registers can be considered to provide health and care services and are not required by law to be registered with a statutory body to practise in the UK.

The IOT defines trichology as 'the science of the structure, function and diseases of the human hair' and clinical trichology as 'the diagnosis and treatment of diseases and disorders of the human hair and scalp.' A Trichologist will take a detailed case history (including family history, diet and medical history) and examine the hair and scalp to diagnose a condition. Once diagnosed the Trichologist will recommend a treatment to the client. Any products recommended by a Trichologist will be available over the counter as they are unable to prescribe. Trichologists give advice and support to those with hair related problems, including to people who have lost hair through chemotherapy treatment. Trichologists are not required by law to be registered with a statutory body to practise in England, Scotland, Wales, and Northern Ireland. The Accreditation Panel therefore found that these roles come under the scope of the Accredited Registers programme.

We noted that the IOT also has a register of international practitioners. It is important that the IOT is clear about the scope of its accreditation with the PSA in its communications with its registrants and the public, and we therefore issued Recommendation One.

The Accreditation Panel determined that there did not appear to be extensive evidence for either the benefits or risks of trichology. There does however appear to be potential benefits, and these do not appear to be outweighed by any potential risks. However, having reviewed the IOT's website, the Accreditation Panel found that the limited evidence that is available was not clear to the public. We therefore

issued Condition One. It is also important that the IOT continues to develop and review the evidence base for trichology, so we issued Recommendation Two.

*Accreditation Panel meeting 17 November 2023*

The Accreditation Panel confirmed that this Standard is met with a Condition.

## **Standard 2: the organisation demonstrates that it is committed to protecting the public and promoting public confidence in the occupation it registers**

### **Summary**

When the Accreditation Panel initially met on 10 August 2022, it found that this Standard was not met due to concerns about the IOT's governance arrangements and the lack of separation between oversight of its membership, education and training, and registration functions. The Accreditation Panel therefore required the IOT to complete Actions One and Two. The Accreditation Panel also noted that Actions Five and Six could impact this Standard.

When the Accreditation Panel reconvened on 17 November 2023 it found that Actions One and Two had been addressed. The Accreditation Panel found that Actions Five and Six had been partially met but there were some areas that needed to be improved and therefore issued Conditions Six and Seven. This Standard was therefore found to be met subject to these Conditions.

### **The Accreditation Panel's findings**

*Accreditation Panel meeting 10 August 2022*

At the initial Panel meeting, we found that there wasn't adequate separation of functions and that the IOT's governance was not sufficiently focussed on public protection. We noted that all decisions were made or ratified by the Board and highlighted the importance of a separation between functions aimed at developing the membership body, and those aimed at regulation. This allows a focus on public protection, for example making sure decisions about appropriate standards are separate from those about financial viability and membership interests. We determined that the dual role of the Board in promoting the benefits of membership with the IOT as a professional body and ensuring its financial sustainability conflicted with its role in overseeing its regulatory functions (which inevitably involves taking decisions which might affect the size of the membership and burdens on registrants). This represented a significant conflict of interest.

We considered the introduction of its Independent Body providing oversight of registration decisions but noted that the remit of this group was very narrow as it only considered registration decisions and did not have oversight of other decisions that may impact registration such as complaints. We determined that this did not create sufficient separation.

We also considered the potential conflict of interest arising from the IOT providing product endorsements and found that while it may be acceptable for a membership body to provide endorsements and use the funds for membership activities, this was not compatible with registration functions, which should be focused on public protection and avoid actual or perceived conflicts of interest. We determined that this is a significant conflict of interest. It was not clear how the IOT's governance structures would enable a clear separation between the two and ensure the register's focus on public protection.

The Accreditation Panel therefore issued Actions One and Two.

#### *Accreditation Panel meeting 17 November 2023*

The Accreditation Panel considered the IOT's response to the Actions issued at the adjourned Panel meeting, aimed at addressing the concerns above. The IOT introduced new governance structures to separate the oversight of the register and registration functions from the general running of the organisation.

The IOT have introduced a Registration Committee (RC) which is responsible for overseeing and making decisions about the register. The RC reports to the Board, but its decisions do not require ratification. The RC is not involved in making decisions about the financial sustainability of the IOT and the register is funded through registration fees, which removes the potential financial conflict of interest. The IOT have also introduced an Independent Ethics Committee (IEC) which is involved in handling complaints. Both these committees include a mixture of lay and professional members. The Accreditation Panel was satisfied that the actions taken by the IOT mitigate the potential conflicts of interest identified at the initial Panel meeting and that they had therefore addressed the Actions.

The Accreditation Panel also noted that Actions Five and Six relate to this Standard and found that although the IOT had considered these Actions there were still areas for improvement so issued Conditions. The Accreditation Panel therefore found that this Standard was met subject to these Conditions. More information about the IOT's response to these Actions is under Standard 11.

### **Standard 3: risk management**

#### **Summary**

The Accreditation Panel found that Standard is met. The Accreditation Panel issued the following Recommendation:

3. The IOT should:
  - a) review and update its risk matrix to ensure that it fully covers all the risks involved in practice, including poor hygiene, adjunctive therapies, poor record keeping, inappropriate business premises and practising without insurance. The IOT should ensure that all relevant controls are considered.
  - b) The IOT must develop its risk management processes to include processes for the identification and monitoring of risks. The IOT should consider maintaining a formal risk register (such as the matrix submitted as part of its application for accreditation) as a tool to record, assess and manage risks.

#### **The Accreditation Panel's findings**

#### *Accreditation Panel meeting 10 August 2022*

When reviewing the risk matrix, we noted that the IOT had not included risks related to infection control, adjunctive therapies, poor record keeping, inappropriate business premises and practising without insurance in its risk register. Most of the mitigations for the risks included refer to the IOT's *Code of Professional Practice and Ethics*, its CPD requirements and education and training as controls. The IOT noted

that they do provide some guidance for its members within the members area which is not included within the risk matrix.

We therefore issued Recommendation Three for the IOT to review and update its risk matrix to ensure it includes all relevant risks and mitigations appropriate to the practice of its registrants.

*Accreditation Panel meeting 17 November 2023*

The Accreditation Panel confirmed that this Standard is 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**

### **Summary**

The Accreditation Panel found that Standard 4 is met.

### **The Accreditation Panel's findings**

*Accreditation Panel meeting 10 August 2022*

As part of our due diligence for this Standard, we considered the information held on Companies House for the IOT. Accounts indicated that the organisation is financially sustainable. The IOT provided a certificate of good standing from Companies House. We verified that the IOT holds appropriate liability insurance.

We considered the IOT's income streams, noting that some funding comes through product endorsement. The Accreditation Panel noted that the IOT had confirmed that it was not reliant on this funding. The Accreditation Panel found that the IOT was currently financially sustainable and therefore that this Standard was met. However, there was a potential conflict of interest in using the funding from endorsements to fund the register, which was considered under Standards Two, Five and Seven.

*Accreditation Panel meeting 17 November 2023*

The Accreditation Panel confirmed that this Standard is met.

**Standard 5: the organisation demonstrates that it has the capacity to inspire confidence in its ability to manage the register effectively**

### **Summary**

When the Accreditation Panel initially met on 10 August 2022, it found that this Standard was not met due to concerns about the IOT's governance arrangements and the lack of separation between oversight of its membership, education and training and registration functions. There was also a potential conflict of interest with using product endorsement funding for the register. The Accreditation Panel therefore required the IOT to complete Actions One and Two. The Accreditation Panel also noted that Actions Five and Six could impact this Standard.

When the Accreditation Panel reconvened on 17 November 2023 it found that Actions One and Two had been addressed. The Accreditation Panel found that Actions Five and Six had been partially met, but there were some areas that needed to be improved and therefore issued Conditions Six and Seven. This Standard was therefore found to be met subject to these Conditions.



The Accreditation Panel issued the following Recommendation:

4. The IOT should develop its business continuity plans and consider succession planning.

### **The Accreditation Panel's findings**

#### *Accreditation Panel meeting 10 August 2022*

The IOT publishes information about who sits on its Board. At the original Accreditation Panel meeting we identified potential conflicts of interest within the IOT's governance arrangements and noted that there was limited lay involvement in the organisation. We also noted the lack of separation between the membership functions and the running of the register and so issued Actions Two and Five.

Key documents such as its *Articles of Association, Code of Professional Practice and Ethics* and its *Complaints Policy and Procedure* were published on the IOT's website. We reviewed the IOT's handling of conflicts of interest, we noted the information in the IOT's *Articles of Association* and its *Code of Professional Practice and Ethics*. We found that it wasn't clear how the IOT would identify and manage conflicts of interest and therefore the Accreditation Panel had been minded if accreditation was granted to issue a Condition to develop a conflicts of interest policy specifically for the management of conflicts of interest declared by Board and Committee members. The policy would need to include information about how members of Board and Committees should declare any interests (for example, keeping a register of interests, asking for conflicts at each meeting) and its process for managing any declarations.

#### *Accreditation Panel meeting 17 November 2023*

The Accreditation Panel considered the IOT's response to the Actions issued at the adjourned Panel meeting, aimed at addressing the concerns above. The IOT has put new governance structures in place which separate out oversight of the register and registration functions from the running of the organisation. The IOT's response to these Actions is described under Standard Two.

The Accreditation Panel also noted that Actions Five and Six relate to this Standard and found that although the IOT had considered these Actions there were still areas for improvement so issued Conditions. The Accreditation Panel therefore found that this Standard was met subject to these Conditions. More information about the IOT's response to these Actions is under Standard 11.

The IOT also provided its new *Conflicts of Interest Policy* which includes information about how the IOT will handle conflicts of interest at its Board and Committees. This addresses the previous concerns and so the Accreditation Panel decided it did not need to issue any additional Conditions for this Standard.

**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**

### **Summary**

The Accreditation Panel found that Standard Six is met subject to Condition One.

### **The Accreditation Panel's findings**

### *Accreditation Panel meeting 10 August 2022*

The Accreditation Panel considered the information provided to the public about the evidence base and found this could be improved by being clearer about the limitations of the evidence. As discussed under Standard One we therefore issued Condition One.

### *Accreditation Panel meeting 17 November 2023*

The Accreditation Panel confirmed that this Standard is met subject to Condition One.

## **Standard 7: governance**

### **Summary**

When the Accreditation Panel initially met on 10 August 2022, it found that this Standard was not met due to the potential conflicts of interest discussed under Standards Two and Five and the lack of separation between membership and registration functions. When the Accreditation Panel reconvened on 17 November 2023 it found that the IOT had addressed all the Actions, and that Standard Seven is now met with the following Conditions:

**Condition Two** - The IOT should ensure that all members of its Board and Committees are equipped to make fair, consistent, and transparent decisions. The IOT should consider mechanisms such as appraisals for monitoring the ongoing competence of its Board and committee members and consider induction training and ongoing training in areas such as equality and diversity, data handling and decision making in disciplinary procedures for key decision makers.

**Condition Three** - The IOT should explore options for informing and involving the public and service users in what they do and provide an update of progress at the next review of accreditation.

The Accreditation Panel issued the following Recommendations:

5. The IOT should review its website, policies, standards, and guidance documents to ensure they are accessible to service users and consider where 'easy read' formats might be useful.
6. The IOT should develop and publish Terms of Reference for the RC and the IEC.

### **The Accreditation Panel's findings**

#### *Accreditation Panel meeting 10 August 2022*

As discussed under Standard Two at the original Accreditation Panel meeting, we identified potential conflicts of interest within the IOT's governance arrangements and noted that there was limited lay involvement in the organisation. We also noted the lack of separation between the membership functions and the running of the register and so issued Actions Two and Five.

The Accreditation Panel considered the governance of the organisation noting that the IOT was overseen by the Board, which comprised of nine trichologists with different specialities. The website stated that this group is 'responsible for the development and maintenance of different aspects of the Institute, with our Members at the forefront of everything we do'. There was no requirement for lay involvement

on the Board, and the *Articles of Association* mandated that all Directors must be members. The IOT indicated that it was looking at introducing lay advisors, and potentially updating its *Articles of Association* to allow them to be members of the Board.

There was one subcommittee, the Ethics Committee who was responsible for the *Complaints Policy and Procedure*. The IOT produced terms of reference for this committee, but these were not published. The terms of reference shared with the PSA stated that the Ethics Committee is made up of three Directors appointed based on their skill set. Membership of this committee is reviewed at each AGM and remains in place if the member remains a Director. The *Complaints Policy and Procedure* discusses an Independent Advisory Committee which consists of three non-members who can offer independent advice; however, it was not clear what role if any, they have in the decision-making process. As noted under Standard 11, the Accreditation Panel also noted that the Board ratified decisions made during the Complaints process.

The IOT also introduced an Independent Body who was responsible for overseeing registration decisions. The Accreditation Panel noted however that the remit of this group was limited as it didn't cover oversight of all decisions that could impact on registration such as complaints and that this did not mitigate the conflicts of interest identified under Standard Two.

#### *Accreditation Panel meeting 17 November 2023*

The Accreditation Panel considered the IOT's response to the Actions issued at the adjourned Panel meeting. As noted under Standard Two, the IOT changed its governance structures. The IOT introduced the RC which is responsible for overseeing and making decisions about the register. The RC has reports to the Board, but its decisions do not require ratification. The IOT also introduced an Independent Ethics Committee (IEC) which is involved in handling complaints. Both these committees include a mixture of lay and professional members.

The Accreditation Panel is satisfied that the Actions had been addressed and that the new governance structures provide appropriate separation between the different functions of the IOT. This is discussed under Standard Two. The Accreditation Panel found that this Standard is now met with Conditions.

## **Standard 8: setting standards for registrants**

### **Summary**

When the Accreditation Panel initially met on 10 August 2022, it found that this Standard could be met with a Condition requiring the IOT to update its *Code of Professional Practice and Ethics* to make it clear what standards its registrants will be held to with specific information on indemnity cover, the professional duty of candour, safeguarding and work to clarify conflicts of interest. When the Accreditation Panel reconvened on 17 November 2023 it found that the IOT had addressed most of the Condition, however it found that the *Code of Professional Practice and Ethics* could still be clearer about the Standards it held its registrants to so issued the following Condition:

**Condition Four** - The IOT should review and update its Code of Professional Practice and Ethics to ensure greater clarity over its requirements for its registrants.

They should be clear what is a requirement and therefore something that a registrant is held to account for and what is guidance.

**Condition Five** - The IOT should review how it communicates its CPD requirements on its register and ensure that it has appropriate mechanisms in place to check that its registrants are complying with the requirement.

The Accreditation Panel also issued the following Recommendations:

7. The IOT should continue to develop its guidance for its registrants on safe use of products and equipment. As part of this the IOT should consider if it should develop further guidance for its registrants on safe premises and should review the risks in its risk matrix to see if there are any other areas where its registrants would benefit from additional guidance.
8. The IOT should consider developing a formal policy for handling revisions and updates that are outside its schedule.

### **The Accreditation Panel's findings**

#### *Accreditation Panel meeting 10 August 2022*

The Accreditation Panel considered the IOT's *Code of Professional Practice and Ethics*. We found that this was not always clear and noted that there were some gaps including safeguarding, the professional Duty of Candour and indemnity insurance requirements. In addition, it was not clear what the relationship between the *Patient Charter* and the *Code of Professional Practice and Ethics* was and hence how a practitioner could be held to account for not acting in line with the *Patient Charter*. The Accreditation Panel determined that it was not clear from the information presented on the website what to expect from a trichologist.

#### *Accreditation Panel meeting 17 November 2023*

The IOT updated its *Code of Professional Practice and Ethics* to include information on safeguarding, the professional Duty of Candour and its requirements for registrants to hold appropriate indemnity insurance. The Accredited Panel considered the changes and found that although the gaps it had previously identified had been filled it still wasn't clear what was a requirement and what was guidance for registrants, we therefore issued Condition Four.

The Accreditation Panel found that this Standard was met with a Condition.

## **Standard 9: education and training**

### **Summary**

When the Accreditation Panel initially met on 10 August 2022, it found that this Standard was not met as it wasn't clear how the education and training offered a mitigation to the risks highlighted in its risk matrix. The Accreditation Panel also had concerns about the IOT's approach to assessing whether its registrants were suitably trained in the specialisms listed on its register. The Accreditation Panel required Actions Three and Four to be completed.

The Accreditation Panel were also minded to issue a Condition requiring the IOT to make the details of its education and training clearer on its website.

When the Accreditation Panel reconvened on 17 November 2023 it found that the IOT had addressed the Action and updated its website, so the Condition was no longer required. We found that the Standard is now met.

### **The Accreditation Panel's findings**

#### *Accreditation Panel meeting 10 August 2022*

The Accreditation Panel considered the information available to the public about its education and training and noted that this needs to be clear to the public. The IOT's education and training route is externally verified. However, the IOT's course is currently the only route to the register which could present a conflict of interest given the issues identified about the separation of functions under Standard 7.

The IOT allowed registrants to list specialisms on the register, these included working as an expert witness, treating specific conditions or hair types. The Accreditation Panel found that there wasn't enough information about the education and training required or the checks that were carried out by the IOT which would qualify a registrant to list a specialism on the IOT's register. We therefore required the IOT to provide further information about its curricula and the checks it carries out to assure itself that those listing specialisms are appropriately trained. See Actions Three and Four.

We also noted that the IOT placed a high reliance on its education and training for some risks, but there was little information about what the curriculum included (see Action Three). The Accreditation Panel determined that it did not have enough information to decide about this Standard and therefore it is not met at this time.

The Accreditation Panel reviewed the information about the IOT's education and training on its website and found that this information could be made clearer to members of the public and so were minded to issue a Condition to address this.

#### *Accreditation Panel meeting 17 November 2023*

The Accreditation Panel considered the changes the IOT had made to the information on its website about education and training. We found that this was much clearer and as such the Condition was no longer needed.

We considered the information the IOT provided in response to Actions Three and Four. The IOT provided examples of how its curricula mitigated the risks it had identified within its risk matrix. The IOT also changed its approach to handling specialisms on its register. Those with a particular interest in a specific condition or hair type can include that as a special interest on the register rather than a specialism. Registrants can still list expert witness on the register as a specialism once they have supplied evidence of completing appropriate training to the IOT. The Accreditation Panel was satisfied with the approach taken by the IOT and found that this Standard is now met.

## **Standard 10: management of the register**

### **Summary**

When the Accreditation Panel initially met on 10 August 2022, it found that this Standard was not met due to its approach to listing specialisms on the register and issued Action Four. When the Accreditation Panel reconvened on 17 November

2023 it found that the IOT had addressed Action one and that Standard 10 is now met with a Condition:

**Condition Five** - The IOT should review how it communicates its CPD requirements on its register and ensure that it has appropriate mechanisms in place to check that its registrants are complying with the requirement.

The Accreditation Panel issued the following Recommendations:

9. The IOT should consider providing links to other organisations such as regulators or other Accredited Registers that registrants may belong to. This will help facilitate routes of complaint for service users.
10. The IOT should update the information for the public on its website to make clear what its registration requirements for trichologists are.
11. The IOT should review its published processes for registration and renewal, to ensure that they include information about decisions.
12. The IOT should develop a policy for handling positive declarations received during the registration/renewal processes.
13. The IOT should develop systems to check outcomes from other relevant bodies for those registrants who have dual membership, such as with a statutory regulator. This could include highlighting regulators on registrants' individual profiles and including checks of the regulators when conducting spot-checks of registrants.
14. The IOT should develop a restoration policy which makes clear when it can readmit eligible members to the register who have been removed following a disciplinary case, where appropriate. This could form part of the restoration policy, or it could be linked to the lifting of sanctions.
15. The IOT registration appeals policy appears to have multiple rights of appeal. The IOT should review this policy.

### **The Accreditation Panel's findings**

#### *Accreditation Panel meeting 10 August 2022*

The Panel discussed the register and noted that the primary focus appeared to be on helping people to find a registrant but with less emphasis on public protection. For example, the register is located on a page that also highlights the IOT clinic but does not include information about complaints. As noted under Standard Nine, the register listed specialisms but it wasn't clear how the IOT assures itself that its registrants are appropriately trained in these areas. The Accreditation Panel noted that it was not clear how the mentorship process works and so was unable to clarify how people moved between membership grades and what the criteria were for successful upgrades. It was not clear what would happen if a registrant did not successfully complete the mentorship process, and whether only having a single mentor allowed for meaningful mentorship for the registrant base. See Actions 3 and 4.

#### *Accreditation Panel meeting 17 November 2023*

The Accreditation Panel considered the changes the IOT had made to its handling of specialisms, noting the additional checks that the IOT had put in place and found that the Actions had been considered.

The Accreditation Panel noted that it appeared as if some registrants had not completed the required CPD for 2022. It is important that the information on the register is accurate and up to date to allow service users to make informed decisions about the care that they receive. The IOT should review the information presented on the register about CPD to ensure that the requirements are clear to the public and develop mechanisms to ensure that its registrants are compliant with the requirements, see Condition Five.

The Accreditation Panel reviewed the registration appeals policy and noted that there seem to be multiple rights of appeal. There only needs to be one right of appeal and suggested that the IOT may wish to review their policy. The Accreditation Panel found that this Standard was met with a Condition.

## **Standard 11: complaints and concerns handling**

### **Summary**

When the Accreditation Panel initially met on 10 August 2022, it found that this Standard was not met and issued Action Five and Six requiring the IOT to update its processes to make them clearer and to ensure there was appropriate separation between the different stages of its complaints process. When the Accreditation Panel reconvened on 17 November 2023 it found that whilst the IOT had addressed the Actions there were still some gaps and therefore that Standard 11 is met with the following Conditions:

**Condition Six** - The IOT should develop and publish its organisational complaints policy.

**Condition Seven** - The IOT should review its appeals process for complaints outcomes to ensure that it is clear to all parties what the process is. Decision makers should not have previously been involved in the complaint. The IOT should review and update its procedures to ensure there is appropriate separation for appeals.

**Condition Eight** - The IOT should

- a) review and update its Complaints handling policies and procedures to ensure consistency between the different documents.
- b) develop its processes to ensure that they are clear about appeals, interim orders, and other technical aspects as highlighted by the Accreditation Team.

The Accreditation Panel also issued the following Recommendations:

16. The IOT should document its processes for considering sanctions and complaints outcomes from other bodies.
17. The IOT should ensure that the support it offers to complainants is explicit on its website.
18. The IOT should update its safeguarding policy to ensure it is clear what actions the safeguarding lead will take and when they will escalate, and report concerns to the appropriate authorities.
19. The IOT should document its policy for advising relevant bodies (for example another Accredited Register) in the event of a concern being raised that might involve a breach of that body's codes.

### **The Accreditation Panel's findings**

### *Accreditation Panel meeting 10 August 2022*

The Accreditation Panel reviewed the complaints and disciplinary procedures and noted that it was confusing having two procedures and it was difficult to see how they worked together. We found that the process was not clear. We considered how decisions about complaints are made and noted that there was a lack of clarity about who was involved at the different stages of the process. It is not appropriate for the same people to be investigating and adjudicating a complaint, and people involved at these stages should not be involved in any appeals. Complaints panels should also include lay involvement in the decision making and not just in an advisory role. As previously noted, the Board ratified decisions made to remove someone from the register. This is a significant conflict of interest as noted under Standard 7. Regulatory decisions should be independent of the Board.

There were limited sanctions available to the Complaints panel, and we noted that the IOT should have a range of sanctions available that allow it to protect the public in a fair and proportionate way. These outcomes should be published on the register to allow members of the public to make informed decisions about their care. The Accreditation Panel found this Standard was not met and that the IOT will need to make changes to address this, see Actions 2, 5 and 6.

The Accreditation Panel noted that the IOT did not have a published organisational complaints policy so was minded to issue this as a Condition.

### *Accreditation Panel meeting 17 November 2023*

The Accreditation Panel considered the IOT's response to the Actions issued at the adjourned Panel meeting. The Accreditation Panel was satisfied that the Actions had been partially met but noted that there were still some gaps. The Accreditation Panel determined that the changes made by the IOT improved the clarity of its complaints handling processes, however noted that it wasn't clear on its approach to interim orders and appeals process. The Accreditation Panel also noted other improvements that could be made that would make the policy clearer. The Accreditation Panel therefore decided to issue Condition Seven for the IOT to review and update its complaints policies.

The Accreditation Panel noted that the appeals process that would be followed by the IOT was the same used for registration decisions although this was not clear in the complaints handling processes. This meant that appeals would be heard by the RC. The Accreditation Panel determined that this did not provide enough separation as members of the RC would be involved in adjudicating the complaint. It is important that there is separation between the different stages of the process and therefore the Accreditation Panel issued Condition Six.

The Accreditation Panel found that this Standard was met with a Condition.

## **Share your experience**

The public 'Share your Experience' (SYE) process ran from 16 February 2021 to 25 March 2021. We received 17 written responses, ten from IOT members and four from IOT members who also sat on the Board and three from organisations. Thirteen responses were broadly supportive of the IOT's application for accreditation, and four raised concerns. The concerns identified related to the following areas:

- Governance



- Communications and stakeholder engagement
- Standards for registrants
- Education and Training
- Registration
- Complaints handling

We noted the concerns raised through the SYE process mirrored the findings of the Accreditation team's initial assessment. The Actions issued to the IOT at its initial Accreditation Panel addressed the concerns raised. As noted, when the Accreditation Panel reconvened, it found that the IOT had considered all the Actions required.

### **Impact assessment (including Equalities impact)**

We carried out an [impact assessment](#) as part of our decision to accredit the IOT. This impact assessment included an equalities impact assessment as part of the consideration of our duty under the Equality Act 2010.