Accredited Registers Impact Assssment

Accredited Register: Institute of Trichologists (IOT)
Type of Review: Initial
Period under review: N/A
Date Approved: 17 November 2023

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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

Equalities impacts - summary

We reviewed the information provided by the IOT during the assessment and which is available on its website. The IOT confirmed that it does not currently collect data any data about the protected characteristics of its registrants and/or their patients or service users and notes that there are no current plans to do so, but it is something they could consider. For many of the protected characteristics the IOT stated that there were no positive or negative impacts, although as the IOT do not collect data this is difficult to evidence.

The IOT has published an EDI statement on its website which states that 'as an Institute, we have a diverse Membership Register, Student base and Education Providers. We have a duty to ensure that our Institute, and everyone associated with our Institute act in the best interest of the general public and service users.'

We also noted that the IOT has an *Equal Opportunities Policy* for education and training aimed at students and staff which states:
> 'We fully support the principle of equal opportunities and oppose all unlawful or unfair discrimination on the grounds of ability, age, colour, culture, disability, domestic circumstances, employment status, gender, marital/civil partnership status, nationality, political orientation, racial origin, religious beliefs, sexual orientation, social background or any other grounds or status.' The policy sets out aims such as 'regularly assessing the impact on equality in our policies, procedures and practices.'

The IOT also has a Reasonable Adjustment Policy for its course to help ensure that all students get a fair learning and assessment process.

The IOT highlighted that 'accreditation could be beneficial in providing access to a specialist service that is not available on the NHS.' Accreditation requires registers to provide clear information about the services offered and routes of redress should something go wrong. Accreditation could therefore have a positive impact on all service users.

During the initial Panel meeting on the 10 August 2023, we noted that the IOT allowed registrants to list specialisms on the register, these specialisms included working with specific conditions and hair types. The Accreditation Panel felt that listing specific hair types such as 'Afro-Caribbean' as a specialism created the impression that being able to work with all hair types was not a requirement for all IOT registrants. The Accreditation Panel also had concerns about the education and training requirements needed for listing something as a specialism. The Accreditation Panel noted that it was not clear what registrants would need to provide to prove their competence for any specialisms listed or

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what check the IOT carried out to assure itself that registrants were appropriately trained in the listed specialisms. The Panel required the IOT to complete specific Actions to resolve this issue. The IOT changed its approach to listing specialisms on its register. Registrants now list working with specific conditions and hair types as a special interest rather than a specialism on the register. Registrants can still list expert witness as a specialism but to do so, they need to provide evidence of having completed appropriate training to the IOT. This means that those seeking the services of an expert witness can be assured that those listing this as a specialism are appropriately trained.

Impacts on groups with protected characteristics

Age

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral	Young People	Registrants will work with people at all ages including children and young people. The IOT do not currently conduct DBS checks.	Following the completion of the Authority's pilot and consultation on DBS checks, we will update the registers on any new requirements. This may result in registers needing to make changes.	10 August 2022

Disability

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral		The IOT noted that disability isn't a barrier to entering the Trichology profession. We noted that the IOT has a reasonable adjustments policy which should allow fair access to the course.	None required	10 August 2022

Gender reassignment

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral		The IOT highlights that 'Trichology offers Gender reassignment patients vital information in terms of the options for their hair and scalp, this is often missing as part of the medical gender reassignment process, yet is one of the most visual things that a patient is concerned about.'	None Required	10 August 2022

Race

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral		At the initial Accreditation Panel meeting we noted that there was a potential negative impact of accrediting a register which implied that some hair types, such as Afro-Caribbean, were a specialism without assuring us that all registrants were equipped to provide appropriate care to a diverse range of service users.	The IOT were required to complete specific Actions to resolve this before accreditation could be considered. The IOT changed its approach to listing specialisms on the register. Registrants now list working with specific conditions and hair types as a special interest rather than a specialism on the register.	10 August 2022

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Cost and market impacts – summary

The IOT confirmed that the current fee for registrants is £360.50 and that it does not intend to increase the fees next year. The IOT stated that accreditation is unlikely to cause an increase in registrant fees and is unlikely to increase costs for service users or employers.

At the time of the initial assessment we had not identified any other register in the UK for trichologists.

We note that the majority of the IOT registrants work in private practice. Accreditation provides assurance to employers, commissioners and members of the public, and is therefore likely to have a positive impact on those working in private practice in small business.

We did not identify any other cost or market impacts.

Social and environmental impacts – summary

The IOT highlight that having a clear set of standards and processes should benefit patients and service users. The IOT state that

'The objective is to grow the register to other organisations and bodies to increase the overall membership this will:
- Provide a one stop shop for the public to find out about Trichology and registered members.
- Development of recognised Standards for Trichology in the UK.
- Will support Trichology becoming more recognised by the wider Medical Community
- Will lead to development of Further Educational Modules and higher Qualifications
- Will lead to Trichology being recognised by Private Medical Providers
- Will empower members through their numbers to access benefits such as more competitive pricing from preferred suppliers.
- Provide access education modules to enable Membership.
- Disadvantages may be the transparent difference between the different education providers and fitness to practice.

A set of clear standards and processes should be a major benefit to standardise practice and provide outstanding patient experience.'

The IOT considers the environmental impact in the way it works, for example all work is electronic, and everything is recycled wherever possible.

The IOT hope that accreditation will lead to wider acceptance within the NHS, so helping with the workforce shortages that are currently being experienced.

We did not highlight any other positive or negative social or environmental impacts.

Decision
The Accreditation Panel noted the Conditions and Recommendations set out in the report requiring improvements to be made to the complaints processes which should help accessibility. No adverse impacts of accreditation were identified.