

Annual review of accreditation 2020/21

Federation of Holistic Therapists (FHT)

June 2021

Contents

Background	3
Outcome.....	4
Assessment against the Standards for Accredited Registers	5
Share your experience	9
Impact assessment.....	11
Equality duty under the Equality Act 2010	11

About Federation of Holistic Therapists

The Federation of Holistic Therapists (FHT) registers:

- Alexander Technique Teachers
- Aromatherapists
- Bowen therapists
- Craniosacral therapists
- Healers
- Homeopath
- Hypnotherapists
- Kinesiologist
- Massage therapists
- Microsystems Acupuncture
- Nutritional therapists
- Reflexology practitioners
- Reiki practitioners
- Shiatsu practitioners
- Sports therapists
- Sports massage therapist
- Yoga therapists

Its work includes:

- Setting and maintaining standards of practice and conduct
- Maintaining a register of qualified professionals
- Assuring the quality of education and training
- Requiring registrants to keep their skills up to date through continuing professional development
- Handling complaints and concerns raised against registrants and issuing sanctions where appropriate.

As of November 2020, there were 7297 registrants on FHT's register. FHT was first accredited on 9 January 2014. This is its seventh annual review and this report covers 9 January 2020 to 9 January 2021.

Background

The Professional Standards Authority accredits registers of people working in a variety of health and social care occupations not regulated by law. To be accredited, organisations holding such registers must prove that they meet our [Standards for Accredited Registers](#) (the Standards). Accreditation is reviewed every 12 months.

Accreditation can be renewed by a Moderator in cases where all Standards are evidenced to be met. A Moderator can also issue Recommendations.

Where concerns do exist, or information is not clear, a targeted review will be initiated by a Moderator. The outcome of this review is assessed by an Accreditation Panel, who can decide to renew accreditation, renew accreditation with conditions, suspend accreditation or remove accreditation. Panels may also issue Recommendations.

- **Condition** – Changes that must be made within a specified timeframe to maintain accreditation
- **Recommendation** – Actions that would improve practice and benefit the operation of the register, but do not need to be completed for compliance with the Standards to be maintained. Implementation of recommendations will be reviewed at annual renewal.

Outcome

Accreditation for FHT was renewed with conditions for the period of 9 January 2021 to 9 January 2022.

Accreditation was renewed by a Panel following a targeted review of Standards 2, 3, 5, 7, 8, 9 and 10. The Moderator was unable to determine if these Standards continued to be met and recommended a targeted review. The remaining Standards were considered as met by the Moderator. The review considered evidence gathered by the Accreditation team and supplied by FHT.

The following Conditions were issued to be implemented by the timeframe specified:

1. FHT must review and update its *Code of Conduct and Professional Practice* to ensure that they include key professional behaviours such as honesty and integrity. This should include consideration of requirements to be open and honest with service users when something goes wrong with their care, as set out in the professional Duty of Candour. The updated Codes should be provided to the Accreditation team within six months of the publication of this report. (See Paragraphs 8.3 to 8.6)
2. FHT must produce guidance for its registrants to ensure that its requirements in terms of advertising are clear. The guidance should also include information for registrants about the use of social media. FHT should provide copies of any updated policies, procedures and guidance to the Accreditation team within three months of publication of this report. (See Paragraphs 8.7 to 8.10)
3. FHT must provide the Authority with a report of the outcomes and actions of three months of its monitoring of its registrants' websites using its new checklist. The report should set out FHT's process for auditing registrants' websites. This report should be provided within four months of publication of this report. (See Paragraphs 8.7 to 8.10)

The following Recommendations were issued, to be considered by the submission of the annual renewal documentation:

1. FHT should review and update its risk matrix to reflect the concerns about advertising within this review. (See Paragraph 3.3)
2. FHT should update its risk matrix to show that risks associated with offering remote sessions during the Covid-19 pandemic had been considered. (See Paragraphs 8.1 to 8.2)
3. FHT should review *its Professional Conduct Procedure* to ensure that its processes for handling complaints about advertising are clear to both the complainant and the registrant. (See Paragraphs 11.4 to 11.5)

The following report provides detail supporting the outcome.

Assessment against the Standards for Accredited Registers

Standard 1: the organisation holds a voluntary register of people in health and/or social care occupations

- 1.1 There were no significant changes reported or noted in the past year. The Authority found that this Standard continued to be met.

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

- 2.1 There were no significant changes reported or noted in the past year. The Panel considered that the Conditions issued above also impact on FHT's compliance with this Standard and therefore decided that it was met subject to the Conditions.

Standard 3: risk management

- 3.1 At last year's annual review, the Authority reviewed FHT's handling of adjunctive therapies such as Complete Elimination of Autistic Spectrum Expression (CEASE) therapy and homeopathic detox therapy (HDT). The Panel was satisfied with the actions taken by FHT but noted that it did not have any additional policies or position statements relating to vaccination, detox therapy, antibiotics and nutritional supplements. FHT highlighted paragraph 1.4.1 of its [Code of Conduct and Professional Practice](#). FHT also confirmed that it does spot checks on all its registrants' websites, this is linked to the CPD audit, and that it monitors its practitioners' social media posts to ensure that registrants are acting in line with its Codes. FHT confirmed that it did not have guidelines for its practitioners on the use of social media, but that it publishes regular articles in its magazines on this area. The Authority decided to issue a Recommendation that FHT should consider developing guidance for its registrants covering the use of nutritional supplements, vaccinations and antibiotics.
- 3.2 At this year's annual review, FHT provided examples of the articles it had provided to its registrants. We were unable to access all the articles, but noted that those we could access did not appear to be recent. FHT also highlighted Section 6 of its *Code of Conduct and Professional Practice* which focusses on responsible marketing. FHT reported that it has considered the Recommendation, reviewed the information and decided that its guidance should remain the same.
- 3.3 The Moderator reviewed the information provided by FHT and found that this related to the Share your Experience submission which is considered as part of the targeted review and discussed further under Standard 8. As part of these discussions, the Authority noted that FHT had a risk in its risk matrix relating to advertising. The Authority noted that the FHT states 'the lack of complaints against Registrants in relation to this indicates that the Risk likelihood has been reduced.' The Authority noted, however that FHT did not appear to have updated its risk matrix in relation to the examples of mis-

advertising identified by stakeholders and through our own checks. We decided to issue a Recommendation that FHT should review and update its risk matrix in light of the concerns raised through the Share Your Experience process and through the Authority's website checks. (Recommendation 1)

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

Standard 4: the organisation demonstrates that it has sufficient finance to enable it to fulfil its voluntary register functions effectively including setting standards, education, registration, complaints and removal from the register

4.1 There were no significant changes reported or noted in the past year. As part of its due diligence, the Authority reviewed records from Companies House and considered the possible impact caused by the reduction in the number of registrants. The Authority found that this Standard continues to be met.

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

5.1 There were no significant changes reported or noted in the past year. The Panel considered that the Conditions issued as above also impact on FHT's compliance with this Standard and therefore decided that it was met subject to the Conditions.

Standard 6: the organisation demonstrates that there is a defined knowledge base underpinning the health and social care occupations covered by its register or, alternatively, how it is actively developing one. The organisation makes the defined knowledge base or its development explicit to the public

6.1 There were no significant changes reported or noted in the past year. The Authority found that this Standard continues to be met.

Standard 7: governance

7.1 At last year's annual review, FHT reported that it was in the process of recruiting a permanent Executive Director following the end of the interim contract for the previous post holder. FHT noted that the Executive Director 'is the key manager/leader of the Federation of Holistic Therapists. The Executive Director is accountable for ensuring the organisation continues to grow, represent and support its multi-disciplined therapist membership, promoting the highest standards in education and professional practice. The Executive Director acts as the visible face of FHT to all relevant stakeholders, influencing and negotiating to achieve the vision. The Executive Director is accountable for the efficient and effective operation, management and administration of the organisation, in line with its strategic objectives.'

7.2 FHT also reported that this post was being covered by the Senior Management Team with support and guidance from the Board in the meantime to a permanent appointment. FHT aimed to recruit into this position as soon as possible. This year FHT has reported that due to the pandemic it has not had the opportunity to progress its recruitment plans and that this will be reviewed in 2021. FHT confirmed that the role continues to be covered by the senior management team and that this has not had an impact on FHT's

registration functions. The Moderator requested that a targeted review be carried out to ensure that FHT is maintaining the appropriate separation between the roles of the Executive and the Board. FHT provided details of the responsibilities of the Executive Director and the Board and confirmed that its management team is responsible for the day to day running of the organisation and that they report to the Board who provide an oversight role.

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

Standard 8: setting standards for registrants

- 8.1 FHT has published a page on its website dedicated to [Covid-19](#). The page includes a statement from FHT which is frequently updated following Government advice. This provides advice to its registrants in the four nations and links to sources of information. They have provided [advice to registrants](#) about returning to work following lockdown and there is a [page](#) directed towards the public setting out what to expect. FHT has produced [guidance](#) for its registrants on what they need to do to safely return to work following lockdown. FHT has noted that some of its therapists may be doing remote sessions. The Authority asked if FHT had produced any guidance for its registrants on remote working. FHT confirmed that it does not think further guidance is needed 'since the few members that are practising remotely [...] should be working in the same way as they would in person'
- 8.2 The Moderator noted that FHT was allowing some of its registrants to provide remote sessions and requested further information. FHT reported that 'We are aware of members offering the following treatments remotely – these are the modalities that have been reviewed by FHT, the Education Panel and the insurers, and have been permitted to be offered remotely. However, please note members are not treating in the 'true sense' that one would be accustomed to in a face-to-face session. All sessions are live (not pre-recorded) and focus on offering clients self-help tips to alleviate stress and promote relaxation. Members are only permitted to work with clients based in the UK.' FHT confirmed that registrants are only allowed to work with existing clients in this way. The Authority noted that this is not included in FHT's risk matrix and issued a Recommendation for FHT to update its risk matrix to show that risks associated with offering remote sessions during the Covid-19 pandemic had been considered. (Recommendation 2)
- 8.3 At last year's annual review, the Authority considered how Accredited Registers approached the professional Duty of Candour. FHT reported that its [Code of Professional Conduct and Practice](#) do not specifically cover the professional Duty of Candour, although 'there are elements of the *Code of Professional Conduct and Practice* that mention the need for therapists to communicate clearly with clients to ensure that they are fully informed about the treatment being given.' FHT reported that it has not previously provided guidance on the professional Duty of Candour to its registrants because it took the view that this had the potential to jeopardise registrants' standing in the event of an insurance claim. The Authority decided to issue a Recommendation that FHT should consider developing its guidance on the professional Duty of Candour, ensuring that it encourages candour whilst maintaining the validity of insurance claims.

- 8.4 As part of this annual review, FHT informed us that its position remained the same. It told us that its insurance underwriters had advised that no member should apologise for any incidents in case it comes across as admitting liability, which could jeopardise a claim.
- 8.5 The Moderator asked for a targeted review to compare against what other registers had done in this area. The team highlighted guidance produced by the Complementary and Natural Healthcare Council which appears to take a different approach, as detailed in its [guidance](#) to registrants. The team also reviewed FHT's *Code of Professional Conduct and Practice* and noted that it does not discuss behaviours such as honesty and integrity, which have broader applications but are also related to the professional Duty of Candour.
- 8.6 The Panel considered FHT's approach and the approach taken by other similar registers and noted that there is an important distinction between apologising and admitting culpability. The Panel was of the view that the current approach placed greater emphasis on registrants' interests over those of the public. It noted that FHT's Codes did not include requirements for key professional behaviours such as such as honesty and integrity. The Panel decided to issue a Condition: FHT must review and update its *Code of Conduct and Professional Practice* to ensure that they include key professional behaviours such as honesty and integrity. This should include consideration of requirements to be open and honest with service users when something goes wrong with their care, as set out in the professional Duty of Candour. The updated Codes should be provided to the Accreditation team within six months of the publication of this report. (Condition 1)
- 8.7 The Authority received a concern during the accreditation year about FHT registrants not advertising in line with the [Advertising Standards Authority's Committees of Advertising Practice \(ASA CAP\) codes](#). This risked misinformation about the extent to which conditions can be treated by complementary therapy practices offered by registrants. These concerns were shared with FHT. We carried out a targeted review which included our own sample checks of registrants' websites. The findings of this review confirmed that some registrant websites displayed information which appeared to be contrary to the CAP code and which we considered had the potential to be misleading for patients and service users.
- 8.8 FHT highlighted Section 6 of its *Code of Professional Conduct and Practice* which covers Responsible Marketing and confirmed that it was currently investigating the concerns raised by the Authority in line with its complaints procedures, discussed further under Standard 11. The Authority has previously highlighted monitoring of registrants' websites as a key element in mitigating the risk of misinformation. FHT reported that it randomly samples 3.5% of its registrants' websites at the same time as auditing CPD on a monthly basis. This is carried out by the Education Department, who if unsure about the content will refer this to the Communications Manager to determine if further investigation is needed. FHT reported that following the results of our checks, it intends to review the questions it is asking as part of its audit.
- 8.9 The Panel considered the findings of our checks and the information provided by FHT in relation to FHT's *Codes of Conduct and Performance* and the CAP Codes. The Panel noted that the potential issues occurred in a relatively high

number of websites and that this casts doubt on the effectiveness of FHT's monitoring. The Panel considered FHT's *Codes of Conduct and Performance* and noted that although they do include clauses on advertising, registrants would benefit from having additional specific guidance. The Panel decided to issue the following Conditions:

8.10 FHT must:

- a) produce guidance for its registrants to ensure that its requirements in terms of advertising are clear. The guidance should also include information for registrants about the use of social media. FHT should provide copies of any updated policies, procedures and guidance to the Accreditation team within three months of publication of this report. (Condition 2)
- b) provide the Authority with a report of the outcomes and actions of three months of its monitoring of its registrants' websites using its new checklist. The report should set out FHT's process for auditing registrants' websites. This report should be provided within four months of publication of this report (Condition 3)

8.11 The Authority found that this Standard was met subject to the Conditions noted above.

Standard 9: education and training

9.1 There were no significant changes reported or noted in the past year. The Authority found that this Standard continues to be met.

Standard 10: management of the register

10.1 There were no significant changes reported or noted in the past year. FHT confirmed that it had not made any changes to its CPD requirements as a result of Covid-19 but 'we have simply made CPD activities more accessible to our members since they are unable to do many of the usual face-to-face activities that would count toward their annual requirement. We have found that this has made it easier for members to earn their CPD, especially as they have had more time to do it, and it has helped them keep busy during the lockdown. In most cases, members have earned well over their CPD requirement. We are continuing to offer this series.' The Authority found that this Standard continues to be met.

Standard 11: complaints and concerns handling

11.1 At last year's annual review, the Authority issued the following Conditions: FHT should:

- a. provide a prominent section on their front page addressed to users and patients
- b. as part of this have a prominent reference to the complaints process and
- c. provide clear information about the assistance that is available to complainants who have particular needs and more detail about the process and what the person making the complaint can expect.

- 11.2 At this year's annual review, FHT highlighted the actions it had taken in response to the Conditions noting that information about how to complain was included under the Public section of the website accessed from the menu bar and that the complaints process can also be accessed from left-hand menu on the Register page: <https://www.fht.org.uk/search-register>. FHT noted the following text which had been added to its website which highlighted the support available to complainants:

'Support/Assistance

If you have a disability and require assistance with completing the complaints form (e.g. if you require the form in a different format or large font) please contact us by email to registrar@fht.org.uk or call us on 023 8062 4350 and we will happy to discuss this and offer any assistance we can.

FHT also added 'We have noted that there are our Registers whose websites do not have an accessible complaints procedure listed, so we hope that the Authority is raising this issue across the board and not only with the FHT.'

- 11.3 The Authority considered the actions taken by FHT and found that the Condition had been considered.
- 11.4 As noted under Standard 8, the Authority considered how FHT handles concerns raised with it about its registrants advertising. FHT's [Code of Conduct and Professional Practice](#) has a section about responsible marketing (section 6). FHT confirmed that it would handle any concerns raised with it about advertising through its complaints process. FHT's [Professional Conduct Procedure](#) is linked to from the [how to complain](#) page of FHT's website. FHT confirmed that it would investigate any concerns and that the investigation would include asking the ASA, and a third-party group who provide FHT with compliance advice. If they found that the registrant was using misleading advertising, they would contact the registrant, asking them to update the content. If the registrant refused, FHT would refer to the matter to the ASA. FHT confirmed that it would act on any ASA outcomes.
- 11.5 The Panel considered the actions taken by FHT to consider complaints about advertising and reviewed the *Professional Conduct Procedure* to see if it is clear how FHT would handle such concerns. The Panel found that the procedure was not clear about how FHT would handle concerns about mis advertising, for example it wasn't clear how long a registrant would be given to make changes and at what point FHT would take further action. The Panel noted that FHT reported that it had not received any concerns about advertising but considered that it was important for FHT to have a clear process in place to ensure its standards are being met and that registrants and complainants are aware of the processes being followed when raising complaints about advertising. The Authority decided to issue a Recommendation: FHT should review its Professional Conduct Procedure to ensure that its processes for handling complaints about advertising are clear to both the complainant and the registrant. (Recommendation 3)
- 11.6 The Authority found that this Standard continues to be met.

Share your experience

- 12.1 The Authority did not receive any responses to the invitation to share experience, however, did receive one concern about FHT during the accreditation year. This concern related to the potentially misleading advertising of some of its registrants. This concern is discussed in more detail under Standard 8.

Impact assessment

- 13.1 The Authority took account of the impact of its decision to reaccredit FHT with Conditions.

Equality duty under the Equality Act 2010

- 14.1 The Authority took account of its duty under the Equalities Act when making its decision to reaccredit FHT with Conditions