

Annual review of accreditation 2020/21

International Federation of Aromatherapists (IFA)

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About the International Federation of Aromatherapists

The International Federation of Aromatherapists (IFA) registers:

- Aromatherapists

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 January 2021, there were 167 registrants on the IFA's register.

The IFA was first accredited on 31 March 2020. This is its first annual review and this report covers 31 March 2020 to 31 March 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 demanding [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 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 the IFA was renewed for the period of 31 March 2021 to 31 March 2022.

Accreditation was renewed by a Panel following a review of evidence gathered by the Accreditation team and supplied by the IFA. The Moderator requested that a targeted review be carried out on Standards 3, 7, 8 and 11 and noted that this may impact on Standards 2 and 5. The Moderator found that all other Standards were met.

No Conditions were issued as part of this review.

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

1. The IFA should monitor how the changes made to its requirements for case studies and its assessments of practical exams during the Covid-19 pandemic equip students to practice safely. (Paragraph 9.1 to 9.2)
2. The IFA should put in place quality assurance mechanisms to ensure the accuracy of the information on the public facing register. (Paragraphs 10.1/10.4)
3. The IFA should review its complaints procedure to ensure that it makes provision for advertising complaints where serious breaches had occurred and provide an updated version to the Accreditation team. (Paragraphs 11.7 to 11.9)

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 At IFA's initial accreditation in 2020, the Authority considered the scope of the IFA register and noted that it covers registrants from multiple countries in addition to those of the UK. The Authority considered the legal advice about international registrants and the use of the quality mark which stated that the Authority should not allow members of Accredited Registers who are working abroad to use the quality mark or advertise that they are on an Accredited Register. In line with previous decisions, the Authority decided to issue the following Recommendation: the IFA should ensure that the remit of accreditation by the Authority is clear to the public (by for example adding a statement to its website) and that only UK registrants make use of the accreditation quality mark and other benefits of accreditation. The IFA should monitor how its registrants communicate accreditation. Monitoring should take place throughout accreditation life and an update provided at annual review.
- 1.2 The IFA make it clear on its [website](#) that accreditation applies to the UK only. This was also made clear in its [statement](#) announcing accreditation last year. The IFA updated its *Members terms of use of logos* to include the use of the AR Quality Mark. These are provided to each practitioner upon registration and renewal. Registrants are required to agree to comply by the terms of use to enable them to register and/or renew.
- 1.3 The IFA reported that once a member is registered, they are sent the logo by the Registrar to ensure that registrants are using the correct logo. The IFA undertake spot checks on the use of their logo and the AR Quality Mark. The IFA also monitor submissions through its 'report misuse or abuse of IFA status or use of logo' online form through its website.
- 1.4 The Authority found that the Recommendation had been considered that the Standard continues 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 Authority noted the guidance the IFA had produced for its registrants whilst practicing during the Covid-19 pandemic.
- 2.2 The Authority considered information raised as part of the targeted review and found that this Standard continues to be met.

Standard 3: risk management

- 3.1 The IFA provided its updated risk register to the Authority. The IFA updated its risk register to include a risk relating to the pandemic. Following its review of the concerns raised about advertising, the IFA also updated the risk relating to inappropriate advertising in its register. The IFA has produced additional

guidance for its registrants and included information in its newsletter to ensure its registrants were aware of the correct advertising requirements and advising all registrants to check their content was compliant.

- 3.2 The Authority considered the information raised as part of the targeted review and found that this Standard continued 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 the Charity Commission and found that this Standards 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 Authority considered the information raised as part of the targeted review and found that this Standard continued to be met.

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 There were no significant changes reported or noted in the past year. The Authority noted that the IFA's Board had a new Chair.
- 7.2 At the time of the Moderator meeting the Chair's biography on the IFA's website stated that 'As well as running his own complementary therapy business, in 1989 he launched the Canterbury School of Natural Therapies to offer practitioners HE level training.' This statement appeared to indicate that the Chair was an owner of a complementary therapy school and the Moderator noted that this could be a potential conflict of interest. The IFA subsequently informed the Authority that the school closed in the late 1990's and as such there is no conflict of interest. As part of its review, the team highlighted the IFA's processes for handling conflicts of interest. The Authority reviewed the IFA's Board minutes and noted that it considers conflicts of interest at each meeting. The Panel noted that the team had to ask for the minutes as they had not been published at the time of the Moderator meeting. The Authority considers that it is important for openness and transparency that Board meeting minutes are published in a timely way. Given the potential for the conflict of interest that exists within the IFA Board, the Panel noted that it was important for the IFA to be seen to be managing this conflict.
- 7.3 The Authority found that this Standard continued to be met.

Standard 8: setting standards for registrants

- 8.1 At last year's initial review, our Accreditation Panel reviewed IFA's *Code of Conduct, Ethics and Practice* and noted that it was a mixture of code, guidance and explanation and found that this could be confusing as it was not always clear which parts of the Code were mandatory and which permitted registrants greater discretion. The Panel noted that other Accredited Registers use a similar model, which incorporates mandatory behaviour, together with guidance and further information, but considered that the boundaries between these were unclear in the IFA's *Code of Conduct, Ethics and Practice*. This could be confusing for registrants and patients. The Authority decided to issue a Recommendation that the IFA should consider reviewing its Codes to ensure that it is clear where the requirements are mandatory, and the IFA will take action following a breach and which parts constitute guidance or further information to supplement the mandatory requirements. It also recommended that the IFA should consider whether it needs to get legal advice on mental capacity as part of its review.
- 8.2 The IFA reported that it had updated its *Code of Conduct, Ethics and Practice* to reflect the Panel's comments. With regard to obtaining legal advice on mental capacity, the IFA noted that 'we have checked this with the chamber of commerce and also members of our advisory board have reviewed the codes, one of which is a doctor and two registered nurses.' Before making changes to its Codes, the IFA consulted with its registrants regarding the codes and whether they felt that any additional guidance was needed. The IFA reported that 'the majority of feedback related to specific workplace questions relating to COVID-19 and that they found the codes supportive.' The IFA incorporated changes to reflect this feedback as part of its update.
- 8.3 Also, at IFA's initial accreditation, the IFA reported that it either reviews its policies and procedures on an annual basis, or when there is a new regulation which will have an impact on its standards. Where updates have been identified, these are highlighted in the relevant documents and taken to the Board by the Chief Executive for approval. The original Panel considered the IFA's quick response to its requests following an adjourned meeting and while it welcomed the changes, it noted that there had not been any consultation with stakeholders about the changes made to IFA's Codes and that, normally, it would expect Accredited Registers to consult patients and stakeholders on changes to rules and procedures. The Panel also noted however that the changes made in this instance were minor. The Panel decided to issue a Recommendation that the IFA should consider the processes it has in place to ensure stakeholder engagement when it is updating its policies and procedures. The IFA should also consider consulting registrants and other stakeholders when for example updating its Codes or processes.
- 8.4 As noted above, the IFA reported that it had consulted with its members before updating its Codes and incorporated their feedback into the updates. The feedback form is hosted on the members area of the IFA's website, allowing members to provide feedback throughout the year. The IFA's engagement strategy also includes periodic surveys and questionnaires to the

public, the results of which inform updates to the IFA's codes, policies and guidance documents.

- 8.5 The IFA has a flow diagram demonstrating its procedure for reviewing documents which was shared with the Authority. The IFA also notes that it has 'established a very open relationship with our members who always know they can contact us for further guidance, member groups and forum to discuss issues affecting their work, which is monitored by IFA staff. At every AGM members have the right to bring to our attention anything they wish to be discussed and before every council meeting. The IFA monitor all feedback and enquiries made to the office and update guidance where appropriate.'
- 8.6 The IFA reported that 'as a general principal, we revise the codes when the majority of members would benefit from the inclusion of a clause or if a new legislation dictates e.g. GDPR. We constantly engage with stakeholders and service users to ensure our policies remain fit for purpose and to increase our membership value.'
- 8.7 The Authority noted the IFA's processes for updating its policies and procedures and the engagement it carries out with its registrants, the public and other stakeholders which informs any changes. The Authority reviewed the updated *Code of Conduct, Ethics and Practice* and considered that the areas that had caused concern were much clearer. The Authority found that the Recommendations had been considered.
- 8.8 IFA has provided [guidance](#) to its registrants regarding practising in the pandemic. It has also produced [Returning to Work Guidance](#) and [Hygiene Secure Practice Guidance](#) for its registrants who are returning to work following the lockdowns.
- 8.9 The Authority received a concern during the accreditation year about some of the IFA's registrants who may have been advertising in breach of 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 aromatherapy. These concerns were shared with the IFA.
- 8.10 As a result of the concerns raised the Accreditation team carried out a targeted review which included its own sample checks of registrants' websites. The findings of this review confirmed that some registrant websites displayed information which could potentially mislead patients and service users.
- 8.11 Following receipt of the concerns, the IFA contacted the registrants concerned requesting that they remove the problematic content. The IFA has also worked with the ASA to develop an approved descriptor for its registrants and is encouraging its use through its communications such as newsletters. For those registrants who do not wish to use the agreed descriptor, the IFA has developed a crib sheet, which registrants can use to check their own descriptions against.
- 8.12 The IFA also highlighted part D11 of its *Codes of Conduct, Practice and Ethics* which states that 'All advertisements must comply with the Advertising Standards Authority's (ASA) code of practice. If you are in any doubt you should check your advertisements with these organisations before going to

print.’ The IFA also produces supplementary *Advertising Guidelines* for its registrants which provide more details about the requirements.

- 8.13 The Authority has previously highlighted monitoring as a key element in mitigating the risk of misinformation. The IFA reported that it carries out an audit of 20% of its registrants every year between June and August and that this includes registrant websites and social media. The IFA noted that due to these concerns it had bought this audit forward this year.
- 8.14 The Panel noted the IFA’s Codes and supplementary guidance around advertising, the monitoring that it currently undertakes and the work the IFA has completed to agree a descriptor that its registrants can use. The Panel considered the checks carried out on registrant websites, noting that while there may have been some incidents of misinformation, the claims being made by practitioners were not at the highest level of seriousness. The Panel noted IFA’s positive engagement with the issue which included updating its risk register to reflect the concerns raised, developing the descriptor and cribs sheets and disseminating this information to its registrants. The Panel also considered the IFA’s approach to working with registrants to put matters right and considered how the IFA would handle serious concerns. This is discussed further under Standard 11.
- 8.15 The Authority found that this Standard continues to be met.

Standard 9: education and training

- 9.1 The IFA reported that ‘the only change we have to make to our educational standards as a result of the pandemic is the amount of required case studies which has been reduced from 60 to 30 (which is still in keeping with the National Occupational Standards and Core Curricula requirements) from 1st April 2020 – 31st March 2021’. The IFA reported that ‘during the pandemic we have conducted practical examinations via zoom or otherwise deferred due to travel restrictions. We are currently investigating bespoke software to conduct theory exams. In terms of assessing training providers the criterion remains the same.’
- 9.2 The Authority noted the changes that had been made as a result of the pandemic and decided to issue a Recommendation: The IFA should monitor how the changes made to its requirements for case studies and its assessments of practical exams during the Covid-19 pandemic equip students to practice safely. (Recommendation 1)
- 9.3 The Authority found that this Standard continues to be met.

Standard 10: management of the register

- 10.1 At the IFA’s initial accreditation, the Authority considered IFA’s registration process. When a registrant joins the register, the information presented on the register is what is presented to the IFA in the registration form and insurance certificates. Registrants can change the contact details; other changes are made through a request to the IFA Registrar. The team queried if the IFA has any quality assurance processes to ensure the accuracy of the register, the IFA noted that the register should be accurate as all details displayed on the register are pulled from the IFA’s database. Registrants can make limited

changes themselves such as changes to contact details, but all other changes must be approved by the Registrar. The Panel noted that the IFA checks registrants' details against the information provided in their insurance details and limits the information they can edit on the website such as contact details, but did not have any additional checks to ensure that the information presented on the public facing register had not been corrupted and was therefore accurate. The Authority decided to issue a Recommendation that the IFA should consider putting in place quality assurance mechanisms to ensure the accuracy of the information on the public facing register.

- 10.2 The IFA responded that the Registrar ensures the accuracy of information on the public register (cross checks with their qualification certificate, insurance etc), registrants cannot edit their details apart from email and telephone number.
- 10.3 The Authority carried out checks on the IFA's register and noted that details of qualifications were missing for two registrants. The IFA confirmed that the minimum information required for the register remains the name, membership number and qualifications and that the two individuals noted without qualifications were eligible to be on the register but that their membership category had been updated.
- 10.4 The Authority noted that it was important for the public register to be up to date. The Authority understands that it is possible for the links between the database and the public register to break which could result in the information on the register being wrong. It is therefore important to check the accuracy of the published register. The Authority decided to re-issue the Recommendation: the IFA should put in place quality assurance mechanisms to ensure the accuracy of the information on the public facing register. (Recommendation 3)
- 10.5 The Authority found that this Standard continues to be met.

Standard 11: complaints and concerns handling

- 11.1 There were no significant changes reported or noted in the past year.
- 11.2 At last year's initial accreditation, the Authority issued the following Recommendations: 1) The IFA should inform the Accreditation team if any complaints hearings are scheduled within the period of accreditation so that it may make arrangements / seek consent to observe a hearing and 2) The IFA should consider commissioning an independent review of its complaints procedures, including its appeals process to take into account the Panel's comments and to ensure that the process is clear and accessible to the public.
- 11.3 Also, at the initial accreditation, the Authority considered the IFA's publication of sanctions and noted that Caution Orders were not published. The Panel considered that it is in the public interest for all sanctions to be published and decided to issue a Recommendation: The IFA should consider whether it is in the public's interest for Caution Orders not to be published.
- 11.4 IFA reported that the publication of caution orders will be included in the next complaints procedure review in May and that the Authority will be informed when this is done.

- 11.5 The IFA confirmed that it will inform the Accreditation team if it has a case that goes to hearing. All policies and procedures are reviewed annually, the IFA noted that ‘we have a vast amount of lay members on our committees with various high level and varied expertise which provide independent review.’
- 11.6 The Authority considered the IFA’s responses to the Recommendations issued last year and found that they had been considered. The Authority noted that it had not observed a hearing yet but that the IFA will inform the Accreditation team if one comes up so that they can seek consent to observe. The Authority considered the timing of the IFA’s review of its complaint procedure and requested that the IFA provide a copy of any updated procedures to the team so that they can check that the publication of caution orders has been added.
- 11.7 The Authority reviewed the IFA’s complaints procedure and noted that the IFA states that it cannot handle ‘complaints which fall within the jurisdiction of another regulator, for example...complaints regarding a breach of the Committee of Advertising (CAP) code of practice, which is the role of the Advertising Standards Authority (ASA) unless there is evidence of a breach of the Cancer Act 1939. However, the IFA reserves the right to act on the outcome of any other proceedings by the ASA.’
- 11.8 The Authority noted the actions that the IFA had taken to the concerns that had been raised with it about advertising and felt that it was appropriate to work with the registrants to put matters right where minor breaches had occurred. The IFA reported that it would consider potential breaches of its *Code of Conduct, Ethics and Practice* under Section D11 relating to advertising, as there may be issues beyond the Cancer Act that should be considered, for example if a registrants’ advertising was clearly misleading such as claims that aromatherapy can cure a disease or a named condition. The IFA reported that it would judge these types of complaints on a case-by-case basis to decide whether a concern would be resolved informally, dealt with in accordance with its formal procedures, or referred to the ASA. The IFA reported that it will consider this as part of its complaints review in May 2021.
- 11.9 The Authority would expect an Accredited Register to act where there have been breaches of its own Codes and Standards. The IFA Code includes clauses about advertising and so the Authority would expect the IFA to act where there are serious breaches of the ASA’s CAP code. The Authority was concerned that the statement about the approach to advertising in its complaints literature might be too restrictive and so prevent the IFA from being able to take action where serious breaches had occurred. The Authority decided to issue a Recommendation: The IFA should review its complaints procedure to ensure that it makes provision for advertising complaints where serious breaches had occurred and provide an updated version to the Accreditation team. (Recommendation 3)
- 11.10 The Authority found that this Standard continued 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 the IFA 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 IFA.

Equality duty under the Equality Act 2010

14.1 The Authority took account of its duty under the Equalities Act 2010 when making its decision to reaccredit IFA.