Accreditation renewal report Standards 1-8

Human Givens Institute (HGI)

November 2023



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About the Human Givens Institute

The Human Givens Institute (HGI) registers:

• Human Givens Practitioners

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 1 January 2023, there were 268 registrants on the HGI's register.

The HGI was first accredited on 13 April 2016.

On 9 November 2023 we renewed the HGI's accreditation with five Conditions, and one Recommendation. They will next be due a full assessment against our Standards by November 2026.

About accreditation

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

- Condition Issued when a 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 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*) and the new Standard 1 introduced in 2021 by the Authority and which includes the 'public interest test'. Standard One checks eligibility under our legislation, and if accreditation is in the public interest. More about how we assess against Standard One can be found in our *Supplementary Guidance for Standard One*¹.

We used the following in our assessment of the HGI:

- Documentary review of evidence of benefits and risk supplied by the HGI and gathered through desk research
- Documentary review of evidence supplied by the HGI and gathered from public sources such as its website
- Due diligence checks
- Share your experience responses
- Site visits including discussions with members of staff
- Assessment of HGI's complaints procedures.

¹ <u>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</u>

The Outcome

The Accreditation Panel met on 15 September 2023 to consider the Human Givens Institute (HGI)'s application. The Panel was satisfied that the HGI could, with Conditions, meet all the Standards for Accredited Registers.

We therefore decided to renew accreditation with five Conditions.

We noted the following **positive findings**:

- We noted that the HGI is developing equalities impact assessments and provides to support those involved in complaints processes.
- The HGI will also provide a single point of contact to complainants to provide support throughout the process.
- The HGI has a comprehensive Ethics and Conduct policy which includes detailed advertising and safeguarding requirements.
- The HGI has demonstrated a clear focus on equality and diversity
- The HGI's policies were focussed on public protection
- The HGI demonstrated an active review of risks affecting the practice of its registrants

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

Conditions		Deadline
Standard One	 The HGI must ensure that the scope and limitations of Human Givens treatment are clearly communicated to both registrants and the public, particularly regarding situations where a referral to another healthcare professional is appropriate. 	9 May 2024
	 The HGI must set explicit requirements that its registrants must not offer or provide Conversion Therapies. 	9 February 2024
Standard Three	 The HGI's Ethics and Conduct Policy should publish all codes relating to the competence and conduct of its registrants, and this should include reference to the Duty of Candour. 	9 February 2024
Standard Four	 The HGI must provide a plan for developing mechanisms to provide independent assurance of the qualifications it accepts for entry to the register. This must include timescales for implementation. 	9 February 2024
Standard Five	 The HGI must develop a policy for reporting relevant complaints outcomes to appropriate bodies, including the Accredited Registers. 	9 May 2024

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

Recommendations		
Standard	 The HGI should make sure there is a clear rationale for its	
Two	supervision requirements.	

About the Register This section provides an overview of the HGI and its register.

Name of Organisation	Human Givens Institute (HGI)	
Website	https://www.hgi.org.uk/	
Type of Organisation	The HGI is a Private Limited Company (Company Number 4331916) governed by its Articles and Memorandum of Association.	
Role(s) covered	The HGI operates a register for 'fully qualified human givens (HG) therapists' working as psychotherapists and counsellors.	
Number of registrants	Registrant numbers as at 1 Jan 2023: 268	
Overview of Governance	The Human Givens Institute (HGI) is 'run as a private limited company with the publicly stated aim that any profits which might accrue will be used solely to further its educational and professional activities and to spread knowledge of the beneficial implications of the human givens approach as widely as possible'.	
	HGI has a Board, comprised of the directors of the HGI. Also has four specialist committees: Registration and Professional Standards Committee (RPSC), External Oversight Committee for Human Givens Therapy (EOC), Finance and Audit Committee and the Communications and Marketing Committee.	
	'The HGI also works closely with the Human Givens Integrity Group, which leads on evaluation, efficacy, and research, and has six members, all volunteers.	
Overview of the aims of the register	The HGI is the professional and regulation body for Human Givens therapists. It also offers a general membership level (Associate Member) for people interested in the human givens approach.	
	As set out on the HGI's Aims and objectives webpage:	
	• to raise general awareness of the givens of human nature – which clarifies what we need in order to live mentally healthy and fulfilled lives and provides us with the framework for improving all forms of human endeavour and interaction.	
	 to raise awareness of what constitutes effective therapy, and why the human givens approach belongs to this category. 	
	 to improve access to human givens therapy, including via GPs and the NHS 	
	 to extend the use of the human givens approach to other fields, such as education, business and diplomacy 	
	 to improve the way children are educated. to make community life more humane and tolerant to show why human life is intrinsically meaningful. 	

Inherent risks of the practice

This section uses the criteria developed as part of the Authority's *Right Touch* Assurance toop² to give an overview of the work of Human Givens practitioners.

Ri	sk criteria		
1.	Scale of risk associated with Human Givens practitioners. a. What do Human Givens practitioners do?	Human Givens (HG) is a form of psychotherapy. The HGI describes is as 'a practical, holistic and scientific approach to mental health and wellbeing which focuses on what individuals need to live mentall healthy and fulfilling lives. Human Givens therapy draws on the lates insights from neuroscience and psychological research and combine this knowledge with proven therapeutic techniques from a wide range of approaches to provide highly effective interventions. It is a flexible holistic approach that enables therapists to tailor their interventions to the needs of each individual client'. Andrews et al (2011) describe is as a best be understood as an integrative bio/psycho/social approach to the promotion of mental health where empirically grounded clinical	
	b. How many	interventions are employed to assist service users to get their physical and emotional needs met, referencing Griffin and Tyrrell (2004, 2008).	
Huma practi are th	Human Givens practitioners are there? c. Where do	<i>b.</i> There are 268 registrants on the HGI's register. For the AR programme overall, there are approximately 75,000 registrants currently working in broader counselling and psychotherapy roles. We are not aware of any data on the total number of HG therapists working in the UK. It does not appear to be a mainstream modality.	
	Human Givens practitioners work?	<i>c.</i> The HGI has indicated that its registrants may work in private clinics, schools, Local Authority services, and charities. A small number may work in the NHS.	
	d. Size of actual/potential service user group	d. The HGI estimates that each registrant sees, on average, 55 clients per year.	
2.	Means of assurance	Means of assurance will depend on the practice setting. For managed premises such as NHS settings and schools, there will be criminal records and other pre-employment checks required. Independent Human Givens practitioners may choose to be registered with the HGI and adhere to its standards (or other Registers) but are not required by law to do so.	
se hu pra	About the ctor in which man givens actitioners eerate	Registrants on the CBT register will work in a range of settings including the NHS, private healthcare, social care, education settings and private practice ^{3.} Although there are differences in the four UK models, these categorisations tend to broadly apply across all.	

² <u>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.
 ³ <u>The state of the NHS provider sector</u>
</u>

	A significant number of people access mental health and wellbeing support from private practitioners. In some cases, this may be due to long waiting lists for talking therapies on the NHS, or to access treatment that isn't available through the NHS. People can access private providers through a referral from an NHS GP, or by searching for one themselves ⁴ .
	Many primary and secondary schools provide access to professional counselling support. Some charities also provide access to specific groups, such as to veterans or refugees.
 4. Risk perception Need for public confidence in human givens practitioners? 	As many registrants are likely to be self-employed, it is important that members of the public have confidence in the practitioners they choose to deliver therapy. The specific approach of HG, which may not always be available as part of mainstream NHS services, makes it important that the public are aware of what to expect from practitioners. Since registrants may be working with children and/or vulnerable adults, it is important that the public can have confidence there are appropriate safeguards in place.
 Need for assurance for employers or other stakeholders? 	

⁴ Private sector mental health support - Mind

Assessment against the Standards

Standard 1: Eligibility and 'public interest test'

Summary

- 1.1 The Accreditation Panel found that the HGI's register falls within the scope of the Accredited Registers programme.
- 1.2 The Accreditation Panel found it is in the public interest to have registers of practitioners who meet appropriate standards of competence, conduct, and business practice, as required by the HGI.
- 1.3 The Accreditation Panel found that Standard One is met, with the following Conditions:

Condition 1: The HGI must ensure that the scope and limitations of Human Givens treatment are clearly communicated to both registrants and the public, particularly regarding situations where a referral to another healthcare professional is appropriate. This must be completed within six months.

Condition 2: The HGI must set explicit requirements that its registrants must not offer or provide Conversion Therapies. This must be completed within three months.

Accreditation Panel findings

Standard 1a: Eligibility

- 1.4 We assessed whether the HGI's register is eligible for our accreditation, based on the criteria outlined in the National Health Service Reform and Health Care Professions Act of 2002, specifically referring to the definition of a 'voluntary register' in Section 25E⁵.
- 1.5 The HGI's registrants, working as Human Givens practitioners, provide psychotherapy and psychotherapeutic counselling services. This consists of using talking and related therapies with their clients.
- 1.6 The HGI explained to us that Human Givens is:

'a practical, holistic and scientific approach to mental health and wellbeing which focuses on what individuals need to live mentally healthy and fulfilling lives. Human Givens therapy draws on the latest insights from neuroscience and psychological research and combines this knowledge with proven therapeutic techniques from a wide range of approaches to provide highly effective interventions. As well as being a brief, solution-focused approach that helps individuals overcome a wide range of difficulties as quickly as possible, clients leave therapy with greater resilience against future setbacks, as they have an increased understanding of what they need to maintain their own emotional health and practical ways in which to do so.'

⁵ National Health Service Reform and Health Care Professions Act 2002 (legislation.gov.uk)

- 1.7 Human Givens practitioners are not within the range of protected practitioner titles under regulation by the Health and Care Professions Council (HCPC) or other health and care statutory regulators⁶.
- 1.8 The HGI operates a public register of practitioners that meet its standards. This is published on the main HGI website, which also provides information about Human Givens therapies and the HGI's work.
- 1.9 We found that the HGI's register falls within the scope of the Accredited Registers programme and meets the requirements of Standard 1a.

Standard 1b: Public interest test

- i. Evidence that the activities carried out by registrants are likely to be beneficial.
 - 1.10 We considered whether it is likely to be in the best interests of patients, service users and the public to accredit the HGI's register, with consideration of the types of activities practised by its registrants.
 - 1.11 Our assessment checked for evidence that the activities carried out by registrants are likely to be beneficial. We noted there is strong evidence that in general, established counselling and psychotherapy-based interventions provide benefits to individuals both in terms of increased functioning and quality of life.
 - 1.12 Human Givens therapies blend various effective techniques from diverse approaches like cognitive behavioural therapy (CBT), solution-focused therapy, motivational interviewing, and hypnotherapy. This includes methods such as the rewind technique, guided imagery, reframing, metaphor, relaxation techniques, and post-hypnotic suggestion.
 - 1.13 Originating in the 1990s, Human Givens is a relatively recent approach. Existing research suggests it may effectively reduce emotional distress and enhance coping skills, potentially achieving results similar to standard depression treatments, but in a shorter time frame.
 - 1.14 Further research suggested potential benefits across age groups namely for young people with anxiety and depression, and older individuals seeking practical, effective interventions.
 - 1.15 Among specific treatments is the 'rewind technique', designed to treat trauma by helping patients reprocess traumatic memories through guided imagery and relaxation, without reliving the emotional pain. One study showed its potential as a trauma treatment, while another highlighted it can be helpful for Post Traumatic Stress Disorder (PTSD) in armed forces veterans.
 - 1.16 We noted however that at present there was only limited empirical evidence supporting Human Givens and that there was a need for more clinical studies and scientific data to validate the approach. The HGI told us they are actively seeking research partnerships to solidify their evidence base.
 - 1.17 We found that overall, there is evidence that the activities carried out by the HGI's registrants are likely to be beneficial. Whilst effectiveness for existing methods has been established, we noted that additional evidence is needed

⁶ Find A Healthcare Regulator | Professional Standards Authority

to confirm claims of accelerated treatment outcomes. This was particularly important when suggesting increased effectiveness with children and young people, or other protected groups.

1.18 We found that this part of the Standard was met.

ii. Evidence that any harms or risks likely to arise from the activities are justifiable and appropriately mitigated by the register's requirements for registration.

- 1.19 The HGI's risk register demonstrated awareness of both industry-wide and Human Givens-specific risks, such as sexual exploitation and boundary violations. The HGI mitigates the likelihood and impact of such risks through its ethical codes, training requirements and ongoing Continuing Professional Development (CPD) workshops. The HGI issues targeted communications through its journals and websites which incorporate lessons from past complaint investigations.
- 1.20 Human Givens therapy aims to be 'brief and solution-focused, aiming to help individuals regain control over their lives as quickly as possible', suggesting that successful treatment of a mental health issue may take 'four to six sessions on average'. We noted that although other short-term therapies such as CBT are widely practiced, there were potential disadvantages to time-limited therapies, such as risks that clients could feel dissatisfied with short treatments, and affect the ability for practitioner and client to form a therapeutic rapport⁷. The HGI highlighted that although treatment is aimed to be as brief as possible, the practitioner may extend this as required by their client's needs.
- 1.21 We considered that the HGI's materials generally outline the benefits of treatments for various conditions, including emotional and mental health issues. We noted claims to help relieve medical conditions such as 'psoriasis, eczema, asthma, irritable bowel syndrome, chronic pain and migraine'.⁸ Although this was in reference to the emotional components of such conditions, there was limited information about the scope and limitations of registrants' practice. While the HGI's Standards of Competence require working within the bounds of experience and training, we found that the HGI should offer more explicit standards or guidance detailing the treatment limitations and circumstances under which referral to medical care or other professionals is appropriate. This would address a potential risk that such statements may dissuade people from seeking necessary medical treatment.
- 1.22 The Accreditation Panel issued the following Condition:
 - The HGI must assure that limitations of Human Givens treatment, and when it is appropriate to refer to other forms of treatment, are made clear to registrants and the public in its communications. This must be completed within six months.
- 1.23 We noted that the HGI recognised the risk of clients causing physical harm to themselves or the therapist when in a distressed state. To address this, the HGI provided its registrants with guidance in July 2023, referencing the

⁷ <u>https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6625551/</u>

⁸ https://www.hgi.org.uk/therapist-register/how-human-givens-therapist-can-help

National Institute for Health and Care Excellence (NICE) guideline on *Self-harm: assessment, management and preventing recurrence⁹*. The HGI's guidance advised practitioners must not use risk assessment tools to predict future suicide or self-harm recurrence.

- 1.24 The HGI highlighted awareness of risks relating to vulnerable groups. The HGI issued their registrants guidelines for working with children that set out, for example, the action that registrants must take when they become aware that a young client may be at risk of harm. This is reflected in its *Urgent Protection (Safeguarding) Policy.*
- 1.25 The HGI's risk register noted the risk of Human Givens therapists attempting to treat clients while under personal distress. The HGI highlighted that it is an ethical requirement for registrants to have personal capacity to undertake therapeutic work. Capacity is monitored within registrants' supervision sessions, and practitioners who do not have current capacity are expected to make their status clear in their register profiles, personal websites and any other public materials.
- 1.26 The Human Givens approach allows registrants to apply flexibility in the treatments they provide, which may include elements from several related modalities. Practitioners may not however advertise the use of therapies that fall outside the Human Givens framework under the HGI banner. This risk is mitigated through for example registrants' ongoing training, and regular checks of websites by the HGI.
- 1.27 We could not find explicit mitigation against the risk of registrants practising conversion therapy. Conversion therapy is the term for the practice that assumes certain sexual orientations or gender identities are inferior to others and seeks to change or suppress them on that basis. The PSA will not accredit any register that permits conversion therapy. We noted that although the HGI confirmed to us that its approach was aligned with the Memorandum of Understanding on conversion therapy in the UK¹⁰, this was not made clear in its published requirements.
- 1.28 The Accreditation Panel issued the following Condition:
 - The HGI must set explicit requirements that its registrants must not offer or provide Conversion Therapies. This must be completed within three months.
- 1.29 We found that overall, the harms or risks associated with Human Givens practices are appropriately mitigated by the HGI's requirements for registration. We found that this part of the Standard was met, with two Conditions.

iii. Evidence of commitment to providing accurate information about treatments and services.

1.30 HGI practitioners are likely to work in private settings whether independently or as part of wider practices. This means there is scope for promotional

⁹ Overview | Self-harm: assessment, management and preventing recurrence | Guidance | NICE

¹⁰ Memorandum of understanding on conversion therapy in the UK (bacp.co.uk)

materials, websites, or other forms of advertising, from registrants or their employers, to make unproven claims or mislead the public.

- 1.31 The HGI's Ethics and Conduct Policy¹¹ requires registrants to provide clear, open, and accessible information to the public'. The codes require registrants to advertise services within their competence, and to only advertise services within the Human Givens modality as part of their HGI practice. The codes also make clear that registrants advertising 'should never be unfair, false or exaggerated in ways that will mislead the public'.
- 1.32 We were concerned that that the HGI's perspectives on treating conditions like depression, anxiety, and addiction could potentially be misinterpreted or incorrectly communicated by registrants. The HGI website, for example, suggested that Western treatment approaches to schizophrenia, particularly the use of neuroleptic drugs, may be less effective compared to supportive community structures found in some non-western countries.¹² The Panel considered a risk that registrants may refer to such statements and steer their clients away from treatments recommended by the NHS which, for schizophrenia, usually involves an individually tailored combination of talking therapy and medicine.¹³
- 1.33 Claims about the rapid effectiveness of Human Givens Therapy were also noted as an area needing careful communication to manage public expectations.
- 1.34 We acknowledged that the Human Givens Institute (HGI) undertakes regular reviews of registrant websites to check for inappropriate claims. We noted however that it was critical for HGI to ensure that both registrants' and its own communications are clear and grounded in evidence, especially when discussing treatment for children and young people, or other groups at risk.
- 1.35 We noted that the HGI had made recent website changes to make its positions clearer and that it had committed to making further improvements on a new website. This was expected by the end of 2023 and we would assess this in due course.
- 1.36 We found that this part of the Standard was met.

Standard 2: Management of the register

The Accreditation Panel found that Standard Two was met. It issued the following Recommendation:

Recommendation 1: The HGI should make sure there is a clear rationale for its supervision requirements.

Accreditation Panel findings

2.1 The HGI operates a public register for Human Givens practitioners offering counselling services. Their register is published at: https://www.hgi.org.uk/therapist-register/complete-register-list/search-full-list. The HGI also provides a 'Find an HG therapist' directory which allows registrants to promote their own services and provide contact information.

¹¹ <u>https://www.hgi.org.uk/about-hgi/ethics-and-conduct</u>

¹² <u>https://www.hgi.org.uk/useful-information/schizophrenia-and-psychosis</u>

¹³ Treatment - Schizophrenia - NHS (www.nhs.uk)

- 2.2 Registration is open to members of the HGI who have passed the Human Givens College's three-part diploma to 'practitioner' or 'HG.Dip.P.' level. Registrants must adhere to the HGI's 'Fitness to Practise' declaration, which includes insurance, supervision and CPD requirements.
- 2.3 Register entries state any restrictions of practice resulting from disciplinary outcomes, and link to information about complaints. Registrants' personal directory profiles will be taken offline for the duration of any sanction restricting their practice.
- 2.4 The HGI accepts practitioners working internationally. Although its website states 'the register has been accredited in the UK by the Professional Standards Authority for Health and Social Care (PSA)', we noted it was important for the HGI to make sure that the Accredited Registers quality mark is only linked to practitioners working in the United Kingdom.
- 2.5 The HGI sets supervision requirements depending on registrants' practice experience. We received concerns through our Share Your Experience about trainee members potentially receiving insufficient supervision or being encouraged by their supervisors to see clients outside their level of competence. The HGI emphasized that both trainees and supervisors are made aware of the limitations on the types of cases trainees should handle. They further indicated that their new senior supervisors' clinical governance group is in place to advise and develop new CPD in response to issues as they are identified.
- 2.6 We noted that experienced HGI registrants were required to undertake a minimum of two hours clinical supervision per year, which was significantly less than other Accredited Registers for counselling and psychotherapy.
- 2.7 The Accreditation Panel issued the following Recommendation:
 - The HGI should make sure there is a clear rationale for its supervision requirements.
- 2.8 The HGI is considering adding new levels of registration to align with the Scope of Practice and Education (SCoPEd) framework¹⁴. The SCoPEd framework has three levels of competence—Column A for minimum competencies, Column B for 'Accredited' status often required for NHS employment, and Column C for advanced competencies for handling complex mental health conditions. The HGI has recently submitted its Notification of Change¹⁵ application to us concerning its adoption of SCoPEd, and we will consider through this process whether this could affect any of the Standards.

Standard 3: Standards for registrants

The Accreditation Panel found that Standard Three was met. It issued the following Condition:

Condition 3: The HGI's Ethics and Conduct Policy should publish all codes relating to the competence and conduct of its registrants, and this should

¹⁴ SCoPEd (Scope of Practice and Education) (bacp.co.uk)

¹⁵ notification-of-change-process-guide.pdf (professionalstandards.org.uk)

include reference to the Duty of Candour. This should be completed within three months of the publication of this report.

Accreditation Panel findings

- 3.1 The HGI sets standards for competence, ethical behaviour, and business practice. Registrants must sign the HGI's Fitness to Practise Declaration, confirming compliance with all registration conditions. The HGI Ethics and Conduct Policy is divided into three sections: a) Code of Conduct for practitioners, b) Standards of Competence, including training and supervision requirements, and c) Ethical foundations of the human givens concept.
- 3.2 The Ethics and Conduct Policy referred to a fourth section 'D' that was not publicly accessible. We considered that all sections of the HGI's codes relevant to registrants should be publicly available. If the fourth section does not contain requirements for registrants, it should be excluded from the codes.
- 3.3 Although the HGI's Codes require registrants to inform their clients of the HGI's complaints procedures, we did not see clear reference to the Duty of Candour to be open and honest when things go wrong. While Accredited Registers are not subject to the statutory Duty of Candour, it is a part of our minimum requirements to promote openness and honesty, accountability, improvement and learning.
- 3.4 The Accreditation Panel issued the following Condition:
 - The HGI's Ethics and Conduct Policy should publish all codes relating to the competence and conduct of its registrants, and this should include reference to the Duty of Candour. This should be completed within three months of the publication of this report.
- 3.5 Our Standards require Accredited Registers' codes to set explicit requirements for registrants' advertising in line with Advertising Standards Authority (ASA) guidelines and relevant legislation such as the Cancer Act 1939. The HGI's Code of Conduct aligns with this, emphasising honest and fair advertising. However as discussed under Standard One, we had some concerns about claims made by the HGI website that, while evidenced, may be exaggerated by registrants. This included that certain issues may be resolved more promptly through HGI treatment than other therapies. The HGI highlighted that its new website would address this.
- 3.6 We also mandate that registrants should have appropriate indemnity cover. The HGI Professional Register Policy obliges registrants to maintain professional indemnity insurance with a minimum coverage of £1 million. Lastly, compliance with annual CPD requirements and the HGI Supervision Policy is required for all registrants, as noted under Standard Two.
 - i. Standards of Competence
- 3.7 The HGI's codes set out the competencies that registrations must demonstrate, focusing on a range of mental health conditions and immediate interventions for conditions like anxiety and depression. We noted that these are updated as required, for example HGI had issued updated guidance

reflecting recent NICE guidelines on self-harm assessment and management.

- 3.8 The codes require registrants to be aware of, and act to take appropriate action to safeguard children and vulnerable adults. These safeguarding processes are detailed within its *Urgent Protection Policy*. This policy advises the actions registrants must take if they become aware of risks to children, drawn from its *Policy and Guidelines for Therapists Work with Children*. Registrants must contact the police in cases of immediate danger, and local children's services if there is risk of abuse or neglect.
- 3.9 The HGI's approach to use of *adjunctive therapies*, or treatments by practitioners outside of the register's scope of practice, is addressed within the codes. Registrants may incorporate ideas and techniques from other trainings, as long as they are compatible with, and employed within, the Human Givens framework.
 - ii. Standards of conduct
- 3.10 The HGI's Code of Conduct sets clear requirements for registrants, for example not to breach sexual boundaries, and the importance of assuring that practitioners do not confuse their own needs with those of clients.
- 3.11 We noted the HGI's codes have clear standards regarding equality and diversity, including taking into account any potential impacts and sensitivities arising from differences between their own cultural background, gender, race, sexual orientation, beliefs, and those of the client.
- iii. Standards of business practice
- 3.12 The HGI's codes of conduct for business practice require honesty and accountability in financial dealings, prohibit misleading advertising, and set its expectations for appropriate use of adjunctive therapies. The codes also provide clear criteria for when to refuse clients or terminate therapeutic relationships, specify that contracts should include terms of business such as costs and cancellation policies, and require that registrants inform clients that any concerns can be escalated to the HGI.

Standard 4: Education and training

The Accreditation Panel found that Standard Four was met. It issued the following Condition:

Condition 4: The HGI must provide a plan for developing mechanisms to provide independent assurance of the qualifications it accepts for entry to the register. This must include timescales for implementation and is due within three months of publication of this report.

Accreditation Panel findings

4.1 The HGI admits practitioners to its register who have completed the threepart Human Givens Practitioner Level Diploma (HG.Dip.P) at the Human Givens College. The College's training programme is open to any applicant and does not require previous counselling or psychotherapy training.

- 4.2 The complete program combines both online and in-person courses and requires students to demonstrate clinical competence of the Human Givens framework, such as the rewind technique. Graduates of the College may use the 'HG.Dip.P' title and are invited to join the HGI's register.
- 4.3 The College is owned and operated by the HGI Directors, while the management of the register is handled by the HGI's Registration and Professional Standards Committee (RPSC), which includes lay membership. This structure enables potential conflicts of interest between the College and the register to be managed.
- 4.4 The HGI informed us that the College's training specifically addresses the boundaries of a Human Givens therapist's scope of practice, including when to direct clients to other health and social care providers. This guidance covers areas like medication and physical healthcare, safety planning in mental health, and addressing safeguarding concerns. We considered it essential that qualifications awarded by the College were independently assured as providing these skills.
- 4.5 The HGI College's diploma is currently accredited by a CPD body. The HGI told us the College is seeking university accreditation equivalent to a Regulated Qualifications Framework (RQF) Level 7 course. We were concerned about whether the current accreditation gave sufficient independent assurance about the how the qualifications delivered the levels of competence necessary for independent practice within counselling and psychotherapy. We also noted that the term 'Post Graduate Practitioner's Assessment' used by the HGI College could misleadingly imply current RQF Level 7 qualification. We noted that the HGI has plans for further accreditation of its courses, but thought it is important that these are expedited.
- 4.6 The Accreditation Panel issued the following Condition:
 - The HGI must provide a plan for developing mechanisms to provide independent assurance of the qualifications it accepts for entry to the register. This must include timescales for implementation, and is due within three months of publication of this report.

Standard 5: Complaints and concerns about registrations

The Accreditation Panel found that Standard Five was met. It issued the following Condition:

Condition 5: The HGI must develop a policy for reporting relevant complaints outcomes to appropriate bodies, including the Accredited Registers. This must be completed within six months of publication of this report.

Accreditation Panel findings

5.1 The HGI's website sets out how it manages complaints against registrants¹⁶. Concerns received will be assessed using the HGI's 'Complaint Assessment and Progression Matrix' (CAPM). These are reviewed by the Registration and Professional Standards Committee (RPSC) to determine whether informal resolution or escalation is appropriate. If the latter, an investigation

¹⁶ HGI Complaints Information | www.hgi.org.uk

is launched to decide if there is a 'case to answer,' during which interim suspensions can be applied. Subsequently, a panel hearing is convened to identify a breach of the Code of Ethics and Conduct. If breaches are found, and confirmed by any subsequent appeal, a decision is published on the HGI's website.

- 5.2 We noted that significant improvements had recently been made to the HGI's complaints processes that fulfilled previous Conditions of Accreditation, and aligned with the Standards. We also noted positively that the HGI is developing equalities impact assessments and provides a single point of contact to complainants to provide support throughout the process.
- 5.3 We were concerned that a published complaint decision did not refer to relevant parts of its Ethics and Conduct Policy. We highlighted a need for the HGI to ensure these are considered within complaints investigations and referenced in published decisions. The HGI told us this had been addressed in recent panel training.
- 5.4 We considered a concern received through our Share Your Experience process that a complaint against a registrant had appeared to have been managed outside of its formal procedures. The HGI confirmed that all complaints are assessed against their Complaint Assessment and Progression Matrix. Appropriate complaints may be resolved through informal resolution and decisions to do so are communicated to the complainant.
- 5.5 The HGI did not have defined processes for informing other Accredited Registers, or other relevant bodies such as the police or social services, of complaints outcomes where it is in the public interest to do so. We noted that the HGI was not a signatory to the Accredited Registers Information Sharing Protocol, through which the registers 'share information so as to support Mutual Recognition of outcomes of disciplinary proceedings that lead to removal from an AR'¹⁷.
- 5.6 The Accreditation Panel issued the following Condition:
 - The HGI must develop its policy for reporting relevant complaints outcomes to appropriate bodies, including the Accredited Registers. This must be completed within six months of publication of this report.

Standard 6: Governance

The Accreditation Panel found that Standard Six was met.

Accreditation Panel findings

6.1 The HGI is a Private Limited Company governed by its Articles and Memorandum of Association. It is operated by a Board of Directors supported by committees which include lay membership. The HGI's focus on public protection is set out within its Ethics and Conduct Policy¹⁸. We suggested that the HGI may wish to incorporate such objectives into any future update of its Articles.

¹⁷ Accredited Registers Information Sharing Protocol - AHCS

¹⁸ https://www.hgi.org.uk/about-hgi/ethics-and-conduct

- 6.2 We checked there is a way for someone to raise a concern or complaint about the Accredited Register. The HGI provides a specific section on its website for individuals to raise concerns or complaints. The External Oversight Committee (EOC) manages these and directs any necessary actions back to the HGI. Directives not followed by the EOC would be reported to the PSA.
- 6.3 Information about the HGI's Board, its Terms of Reference, recruitment policies and meeting minutes are available on the HGI's website. The Board, RPSC and EOC require lay membership to assure that decision making is not limited to Human Givens therapists. We suggested that the HGI could improve transparency by providing some information about all its committees.
- 6.4 The HGI has a published Equality, Inclusion and Diversity Policy¹⁹. The HGI highlighted as an example of its approach that registration applications are anonymised to reduce risk of unconscious bias in decision making. The HGI advised that its Membership Secretary and RPSC Coordinator are available to support applicants who may have additional requirements.

Standard 7: Management of the risks arising from the activities of registrants

The Accreditation Panel found that Standard Seven was met.

Accreditation Panel findings

- 7.1 As set out for Standard One, the HGI manages a risk register that covers potential issues arising from registrants' professional practice. This includes commonly recognised risks in counselling and psychotherapy, such as exploitation due to unequal power dynamics, boundary violations, and issues of transference and countertransference, among others. The risk register is reviewed by the HGI's Board during its bi-monthly meetings.
- 7.2 We considered how the HGI mitigates risks relevant to the practice of its registrants' work within our assessment of Standard One. We issued a Condition requiring the HGI to assure that registrants are aware of and practice within the limits of their competence within that Standard.

Standard 8: Communications and engagement

The Accreditation Panel found that Standard Eight was met.

Accreditation Panel findings

7.3 The HGI's website provides information about the Human Givens approach, its practitioner register, and minimum entry criteria. A dedicated 'Raising Concerns' section and key pages such as 'Choosing a Therapist' are easily accessible. As discussed in earlier standards we considered that some information currently restricted to members, such as CPD requirements, could be made available to the public to assist transparency. The HGI has told us that is working on a new website to improve information accessibility

¹⁹ <u>https://www.hgi.org.uk/about-hgi/equality-inclusion-diversity-policy</u>

and has committed to addressing previously raised issues concerning treatment claims. This was due to be launched by the end of 2023.

- 7.4 The HGI uses multiple channels for communication and feedback, including social media, bulletins, and newsletters. It employs data analytics feedback tools to gauge user experience. Associate Memberships and special interest groups engage both practitioners and the wider community in discussions and initiatives.
- 7.5 The HGI is actively involved in collaborative efforts with the Accredited Registers. It is a member of the Accredited Registers Collaborative and has contributed to developing the Scope of Practice and Education (SCoPEd) framework alongside other Accredited Registers.
- 7.6 The Accreditation Panel noted that Conditions and Recommendations issued in the previous Standards also related to the HGI's communications and that this Standard should be considered when assessing whether they have been met.

Share your experience

- 7.7 We received two responses to the invitation to share experience of the HGI. One concerned a risk that trainee practitioners may receive insufficient supervision or be encouraged by their supervisors to see clients outside their level of competence. The second raised a concern that their complaint against a registrant and HGI officer was not handled appropriately.
- 7.8 We took account of these concerns, and the HGI's responses, within our assessment.

Impact assessment (including Equalities impact)

- 7.9 We carried out an impact assessment²⁰ as part of our decision to renew accreditation of the HGI. This impact assessment included an equalities impact assessment as part of the consideration of our duty under the Equality Act 2010.
- 7.10 At time of assessment, we had not introduced our new Standard for Accredited Registers: Standard Nine: Equality, Diversity and Inclusion²¹. In future assessments we will check how, for example, the HGI acts to 'understand the diversity of its registrants, service users and complainants and has an awareness of issues that may impact those with protected characteristics as defined by the Equality Act 2010²².
- 7.11 We will not accredit any register that allows the practice of conversion therapy by its registrants. Conversion therapy is the term for therapy that assumes certain sexual orientations or gender identities are inferior to others and seeks to change or suppress them on that basis. We had been concerned that the HGI had not made its position on conversion therapy clear to registrants and the public. We issued a Condition for the HGI to address this within Condition One.
- 7.12 We had concerns that the HGI's statements on mental health conditions affecting vulnerable groups, including children and young people, could potentially deter individuals from seeking or being referred to established mainstream treatments when necessary. To mitigate these risks, we issued Conditions of Accreditation.
- 7.13 We considered that meeting these Conditions would have a positive effect for such groups.

²⁰ HGI Impact Assessment 2023

²¹ Our Standards for health and social care organisations (professionalstandards.org.uk)

²² Or groups listed under Section 75 of the Northern Ireland Act.