

Accredited Registers Programme

Accreditation Panel's Decision

Application for renewal from: Complementary and Natural Healthcare Council (CNHC)
Panel meeting: 18 September 2017 (**accreditation renewed**)
Accreditation valid from: 23 September 2017 – 23 September 2018

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 twelve months.

The Accreditation Panel reviewed the accreditation of the register held by CNHC. Panel members reviewed the annual review application form, an updated risk matrix, and a summary report from the Accreditation team. The Panel had to review the CNHC's compliance with the Standards and decide whether to **renew accreditation, renew accreditation with conditions, suspend accreditation** or **remove accreditation**. The Panel could make recommendations in the form of:

- **Conditions** – changes that must be made to maintain accreditation. If Conditions are not met within the timeframe specified, accreditation may be removed.
- **Instructions** – actions that would improve practice but do not affect compliance with the Standards and that the Panel requires to be implemented and be satisfied of appropriate implementation within a given timeframe
- **Learning Points** – actions that would benefit the operation of the register, the implementation of which would be verified during the annual review of accreditation.

The Panel considered the range of options available to it when making its decision.

The Panel noted the assessment carried out by the Accreditation team for the annual review included:

- Documentary review (annual review form and risk matrix)
- Due Diligence checks and Patient/Service User journey
- Review of Share your experience responses and concerns received during the year of accreditation
- Complaints handling review.

There were no declarations of interest from members of the Panel. A summary of matters considered by the Panel is set out in the Annex. The summary is not intended to reflect all of the matters discussed by the Panel, but to record those that were most important in forming its decision.

Outcome

The Panel was satisfied that CNHC continued to meet the Standards for Accredited Registers. The Panel decided to **renew accreditation**. The renewed accreditation is valid from **23 September 2017** to **23 September 2018**.

Conditions, Instructions and Learning Points

The Panel confirmed that no Conditions, Instructions or Learning Points would be issued as a result of the annual review of accreditation.

Annex – Accreditation Panel’s Decision – application for renewal of accreditation

Organisation:	Complementary and Natural Healthcare Council (CNHC)	Outcome
Panel meeting Date:	18 September 2017	Accreditation Renewed
Update on Conditions issued in the previous year		
<p>There were no Conditions issued as part of the last annual review.</p> <p>Following the last notification of change, the addition of Sports Massage Therapy (approved in October 2016), the Accreditation Panel provided the following Condition:</p> <ol style="list-style-type: none"> 1. CNHC must provide an appropriate definition of sports massage therapy to the Accreditation team. The Condition must be completed before the occupation goes live on the register. <p>CNHC provided the above definition on 15 November 2016. This was assessed by the Accreditation Panel who agreed that this Condition had been met as per the Authority’s letter dated 24 November 2016. The occupation has not yet gone live (see Standard 1 for further details).</p>		
Update on Instructions issued in the previous year		
There were no Instructions issued at the last annual review.		
Update on Learning Points issued in the previous year		
<p>At the last annual review, the Panel provided the following Learning Point to be revisited at the next annual review of accreditation:</p> <ol style="list-style-type: none"> 1. CNHC should consider reviewing their risk register to demonstrate their vigilance in identifying, monitoring, reviewing and acting upon risks associated with the practice of their registrants. 		The Panel agreed that this Learning Point had been considered

<p>CNHC reported that the risk matrix was reviewed in October 2016 and July 2017 by the Chief Executive and Registrar in liaison with the Profession Specific Boards. The team's review of the risk matrix is noted under Standard 3.</p> <p>The Accreditation team suggests that CNHC has considered the Learning Point above.</p>	
<p>Standard 1: holds a voluntary register for people in health and/or social care occupations</p>	
<p>There have been no significant changes reported or noted since last year. CNHC reports that it has seen an increase in the number of registrants since last year.</p> <p>CNHC currently has 15 occupations included on its register. (Alexander Technique teaching; Aromatherapy; Bowen Therapy; Craniosacral Therapy; Healing; Hypnotherapy; Massage Therapy; Microsystems Acupuncture; Naturopathy; Nutritional Therapy; Reflexology; Reiki; Shiatsu; Sports Therapy and Yoga Therapy). CNHC has previously submitted two notification of change requests that were approved by the panel for Kinesiology (May 2015) and Sports Massage (October 2016), neither of these categories have been opened yet.</p> <p>The notification of change for the addition of Colon Hydrotherapy to the CNHC register was considered in the week prior to the annual renewal Panel meeting. The Accreditation Panel approved this change with one Condition.</p>	<p>The Panel found this Standard was met.</p>
<p>Standard 2: committed to protecting the public and promoting public confidence</p>	
<p>There have been no significant changes reported or noted since last year.</p>	<p>The Panel found this Standard was met.</p>

Standard 3: risks	
<p>There have been no significant changes reported or noted since last year.</p> <p>As noted above CNHC reports that the risk matrix was reviewed in October 2016 and July 2017. The team reviewed the risk matrix and noted that the risk factors remained unchanged. CNHC added a new risk: Risk 1 - practitioners are not safe and competent to practise due to inadequate training. The existing controls for this risk are that registrants must meet UK standards for safe and competent practice as set out in the relevant National Occupations Standards.</p>	<p>The Panel found this Standard was met.</p>
Standard 4: Financial sustainability	
<p>There have been no significant changes reported or noted since last year. As part of its due diligence, the Accreditation team reviewed records from Companies House and noted that CNHC appears to continue to be financially sustainable.</p>	<p>The Panel found this Standard was met.</p>
Standard 5: capacity to inspire confidence	
<p>There have been no significant changes reported or noted since last year.</p> <p>CNHC provides examples demonstrating its reputation within its field including participating in roundtable meetings with NICE, speaking in support of the Accredited Registers programme at the All Party Parliamentary Group for Integrated Healthcare and receiving the CAMexpo Award for Outstanding Achievement.</p> <p>When looking at openness and transparency, the team noted that CNHC provides details about its Board members its Executive team and its Profession Specific Boards (PSBs) on its website, as well as publishing minutes of its Board meetings.</p> <p>For its Board and PSB members, CNHC provides a brief biography of each member. Whilst carrying out its patient journey, the team noted that the biographies for some of these members were not available. CNHC</p>	<p>The Panel found this Standard was met.</p>

responded that it will publish all the biographies as soon as it received them. CNHC is currently following up with the relevant PSB members.	
Standard 6: knowledge base	
There have been no significant changes reported or noted since last year.	The Panel found this Standard was met.
Standard 7: governance	
There have been no significant changes reported or noted since last year. CNHC has developed a new website during the year. As part of its assessment of Standard 7f, the team carried out a patient/service user journey. The team noted that the website is clear and easy to navigate. Information is provided about the therapies offered, the education and training required by CNHC for registration, and how to complain about registrants and CNHC.	The Panel found this Standard was met.
Standard 8: setting standards for registrants	
There have been no significant changes reported or noted since last year.	The Panel found this Standard was met.
Standard 9: education and training	
There have been no significant changes reported or noted since last year. CNHC reports that it has published the core curriculum for Healing (June 2017), Hypnotherapy and Reiki (July 2017). CNHC's verifying organisations (organisations that have been assessed by CNHC as meeting its criteria who are responsible for verifying that complementary therapists who wish to join the register are eligible) have been informed that they	The Panel found this Standard was met. The Panel noted the thorough approach taken by CNHC.

<p>need to check and confirm that the courses they accredit or recognise meet these requirements. CNHC noted that for Healing, 45 courses have been identified. Due to the large number of courses, the Board have given a six-month timeframe for these checks to be completed.</p> <p>The team asked if there were timeframes available for checking the Hypnotherapy and Reiki courses. CNHC responded that the largest Verifying organisation for Hypnotherapy has nearly 100 courses to check, so they have been given 18 months to complete. The timeframe for the completion of the Reiki courses is six months.</p> <p>CNHC reports that the other PSBs are reviewing the core curriculum for their occupations.</p>	
<p>Standard 10: the register</p>	
<p>There have been no significant changes reported or noted since last year.</p>	<p>The Panel found this Standard was met.</p>
<p>Standard 11: complaints and concerns</p>	
<p>CNHC reported that it updated its complaints procedures in the last year in response to a case that was referred to a hearing. In this case the Case Examiners had some concerns about the record keeping of the practitioner. The Case Examiners however decided that they could not refer allegations that were not included in the written complaint. In May 2017, the Board agreed that changes could be made to the procedure to make it clear that the Case Examiners should consider all information provided to them and not just the information contained within the complaint.</p> <p>Following the handling of a complaint against a member of a PSB, CNHC updated its Complaints against members of the Board and Profession Specific Boards to clarify its procedures.</p> <p>CNHC reports that it received eight complaints against registrants and one complaint against the organisation within the accreditation year.</p>	<p>The Panel found this Standard was met. The Panel discussed lapsed registration with regards to complaints handling and noted CNHC's legal advice and the previous Panel statement.</p>

One of the cases involved lapsed registration, the Panel had previously considered lapsed registration and the potential risks associated with it. In CNHC's 2015 annual review, CNHC reported a case where the registrant had lapsed before the case went to a hearing. CNHC received legal advice that stated:

“The jurisdiction of the Council to initiate disciplinary proceedings can only extend to those who are on its register at the time that the disciplinary hearing is held. This is because the disciplinary procedures are expressed solely as being applicable to those who are registrants. It therefore follows that whilst action can be taken against a registrant whose misconduct/deficient performance arose at a time when he was not registered (and subsequently becomes registered) there is no corresponding power to discipline a person who is no longer registered.”

The following is taken from the Panel decision document:

‘The Panel noted that CNHC received legal advice and that the case will remain on file in case the registrant re-applies. The Panel also noted that CNHC does not accept resignations when the complaints procedure is underway but that they cannot prevent a registrant from lapsing their registration. The Panel noted this as a potential risk. This risk could be managed if in receiving new applications registers developed mechanisms to inquire whether a practitioner has unresolved complaints of fitness to practice issues with another register.’

As part of the annual review process in 2017, the team are focusing on complaints handling, both in terms of complaints against registrants and complaints against the registers. The team arranged a visit to CNHC in August 2017 to discuss how CNHC handles complaints and to review a sample of cases.

The team did not highlight any issues. CNHC follows its published procedures and communicates in an appropriate way to both complainants and registrants. The team noted the level of support that is offered to complainants, especially when a case goes to hearing.

Share your experience and concerns about the Accredited Register received in the previous year of accreditation

The Accreditation team received one response to the invitation to share experience which had no comment to make about CNHC's accreditation. The team received one concern about the potential improper use of the Accredited Registers Quality Mark causing possible confusion over the occupation that the practitioners were registered for. These practitioners were counsellors and hypnotherapists but only registered for hypnotherapy

<p>and not counselling with CNHC. The Team reported five websites to CNHC; CNHC spoke to the relevant practitioners and reported that all had made the necessary changes. This was verified by the team.</p>	
<p>Equality duty under the Equality Act 2010</p>	
<p>The Panel must consider the Authority's equality duty under the Equality Act 2010 when considering an application for renewal of accreditation.</p>	<p>The Panel had regard to its duty under the Equality Act 2010 when considering this application for renewal of accreditation.</p>
<p>Impact Assessment</p>	
<p>There have been no significant changes reported since last year.</p>	<p>The Panel noted and took account of the impact of its decision to renew accreditation.</p>