

Society of Homeopaths – Review of Conditions due October 2020

1. Summary of outcome

1.1 In August 2020, we published the outcome of our in-year review¹ of the Society of Homeopaths (SoH). We undertake an in-year review when serious concerns are raised between annual renewals of accreditation. A Panel issued three new Conditions on the SoH's accreditation, the first two of which were due to have been met by 21 October 2020:

- **Condition One:** The Society must ensure that its recruitment processes include appropriate due diligence checks to assure itself that applicants are, and have been, in compliance with the Society's Code of Ethics² and position statements, including those relating to the use of social media. This should apply to all paid and voluntary positions within the Society including Board and staff members. The Society should also ensure that it has processes in place to assure itself that officials of the Society remain in compliance after appointment. The Society must report to the Authority on the steps it has taken to comply with this condition within three months of the date of notification.

- **Condition Two:**

The Society must provide the Authority with its policy for the escalation of complaints against registrants, which are initially handled informally, into its formal processes and its procedures for handling persistent complainants. The Society must also provide a summary of complaints received since the publication of its new position statement on 10 June 2020 (including those handled through an informal route) and outcomes to the Authority. This should be completed within three months of the date of notification.

1.2 A Panel met on 2 and 11 December 2020 to consider whether the SoH had met these two Conditions. The Panel considered evidence submitted by the SoH as to its compliance with these Conditions.

1.3 The Panel determined that the Conditions had not been fully met, and that the SoH did not fully meet six of the 11 *Standards for Accredited Registers* ('the Standards'). The concerns against the Standards stemmed from a review of the evidence the SoH had provided against the Conditions. Overall, the Panel was concerned that a focus on public protection was not evident in terms of how the SoH was addressing concerns raised about its registrants' compliance with its *Code of Ethics* and position statements.³

1.4 The Panel determined that given the recurrent nature of its concerns, and that the SoH had had an adequate opportunity to address concerns through several

¹ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/panel-decisions/society-of-homeopaths-in-year-report-outcome-august-2020.pdf?sfvrsn=99b77620_5

² <https://homeopathy-soh.org/code-of-ethics-2019/>

³ <https://homeopathy-soh.org/about-us/position-statement/>

Conditions issued in 2020, the SoH's accreditation should be suspended for 12 months (or for a shorter period if the SoH can demonstrate it has fulfilled the Conditions stated at paragraph 1.6 and all outstanding Conditions as set out at [Appendix 1](#), and meets all of the Standards). The Authority found that the SoH did not appear to have prioritised public protection over professional interests in its handling of complaints or governance processes, which undermined confidence in its ability to ensure its registrants were compliant with its own *Code of Ethics* and position statements. This led to risks to the public from homeopathy being offered as an alternative for serious conditions such as depression, arthritis and autoimmune conditions that require medical supervision.

- 1.5 As of 11 January 2021, the SoH and its registrants are not permitted to use the Authority's Accredited Registers quality mark and the SoH is required to have notified its registrants of that by 5pm on 5 January 2021 and submit evidence to the Authority that it has done so by 5pm on 12 January 2021.
- 1.6 The Conditions set by the Panel for suspension to be lifted are that the SoH must:
 1. Demonstrate that it has sought as far as reasonably possible to ensure compliance of its registrants with its *Code of Ethics* (including Advertising Standards Authority (ASA) requirements), and position statements over a period of at least six months. As part of this the SoH must demonstrate that it has taken action to identify and address instances of non-compliance, to the satisfaction of the Authority.
 2. Ensure that it has appropriate separation in place between its functions of protecting the public and supporting professional interests. A clearer focus on public protection must be reflected and applied through its key functions, including:
 - a. Governance
 - b. Setting of standards
 - c. Complaints handling
 - d. Provision of information by the SoH to the public.
 3. Demonstrate through these arrangements and its decisions that it has a clear focus on public protection when considering matters related to the practice of homeopathy by its registrants.
- 1.7 Unless the SoH provides evidence against these Conditions earlier, its accreditation will be reviewed after 12 months of notification of suspension. As well as meeting the Conditions for suspension to be lifted and other outstanding Conditions issued in 2020, the SoH will need to undergo an assessment against all of the Standards for accreditation to be renewed. If the Authority introduces any new processes for accreditation renewal during this time, as proposed through our current public consultation⁴ on the future of the programme, we will write to the SoH to inform of it updated requirements.

⁴ <https://www.professionalstandards.org.uk/news-and-blog/latest-news/detail/2020/06/08/the-authority-announces-a-strategic-review-of-the-accredited-registers-programme>

2. Background

- 2.1 The SoH was first accredited by the Authority in 2014. All registers are assessed against the *Standards for Accredited Registers*,⁵ and the Standards are set at the level of good practice.
- 2.2 Recommendations are issued when opportunities for improvement are identified by the Authority. Conditions are issued when a Standard has not been met and set out what is needed for the register to comply with the Standard(s) within a set timeframe. Previously to this system, the Authority issued 'Instructions' and 'Learning Points.'
- 2.3 Paragraph 7.3 of our published guidance on annual renewal⁶ of accreditation sets out the purpose of Conditions:
Conditions on accreditation can only be issued by a Panel. They are imposed when a Panel has determined that a Standard has not been met. The Condition sets out the requirements needed for the Accredited Register to meet the Standards, within a set timeframe. Conditions are published on the directory of Accredited Registers on the Authority's website.
- 2.4 Upon first being accredited in 2014 the SoH was issued with an 'Instruction' to amend its *Code of Ethics* regarding advertising so that compliance with ASA guidance was a clearer requirement. Subsequently, its *Code of Ethics* was amended to state in Section 42: 'Examples of Codes the Society will also take account of are the relevant clauses of The UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing (CAP Code), and the current guidelines of the Society'.
- 2.5 Concerns about SoH registrants practising 'Complete Elimination of Autistic Spectrum Expression' (CEASE) have been known to the Authority since 2016. In our 2017/18 accreditation decision we issued a Condition for the SoH to 'Develop mechanisms to ensure that registrants who use and advertise CEASE therapy follow the Society's position and do not breach its Code of Ethics and Practice.'
- 2.6 At the subsequent annual review in 2018/19, we noted that SoH registrants were permitted to use the acronym CEASE, but not its full name. We issued a Recommendation that 'The Society should consider and report to the Authority on whether restricting advertising of CEASE to its acronym is meaningful and not misleading to the public. As part of this the Society should consider if use of the CEASE acronym should be banned by the Society for its registrants.'
- 2.7 In February 2020, the Authority imposed a new Condition with four parts in relation to CEASE and other areas of concern (at [Appendix 1](#)). This Condition required the SoH to publish position statements making clear that registrants

⁵ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/standards-for-accredited-registers.pdf?sfvrsn=cc2c7f20_4

⁶ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/guidance-documents/annual-review-process-guide.pdf?sfvrsn=e5c7220_10

- must not offer CEASE or provide advice on vaccination. In response to concerns raised in the annual assessment about its registrants offering advice outside the scope of their practice, the SoH was also required to provide quarterly reports on the monitoring of its registrants' websites, with the goal of having checked and taken appropriate action on all of its registrants' websites and social media by the time of its next accreditation renewal in February 2021. The purpose of being asked to provide quarterly monitoring was so that the Authority could assess during the year whether its approach appeared effective and gave confidence in the SoH's ability to take action in relation to concerns, in order to mitigate the serious risks identified in recurrent reviews.
- 2.8 In June 2020, a Panel found that parts a) and b) of the Condition, to publish position statements, had been met. Shortly after that decision had been made it came to the Authority's attention that the SoH's newly appointed Professional Standards and Safeguarding Lead had posted social media comments which appeared to contravene the Cancer Act and promote anti-vaccination messages. The Authority investigated and found that appropriate due diligence had not been followed in the recruitment of this key role, which raised concerns about the Society's commitment to ensuring compliance with the position statements and broader *Code of Ethics*.
- 2.9 A number of further concerns were raised at this time about other registrants' websites and social media, with several still appearing to offer CEASE, and a larger number advertising homeopathy as a treatment for conditions that require medical supervision. The main risk this presents is that patients and the public may choose homeopathy as an alternative to medical treatment. This includes choosing homeopathy as a 'treatment' for autism or Autistic Spectrum Disorder for children.
- 2.10 The Panel decided in July 2020 that further Conditions should be issued to allow the SoH time to address and mitigate these risks. This decision recognised that although the original Conditions had allowed a timeframe of one year for the SoH to monitor and ensure compliance by its registrants with its *Code of Ethics* (which includes ASA requirements) and position statements, the issue of the Professional Standards and Safeguarding Lead and the extent of the concerns on recurring issues raised new concerns about whether the Society was taking sufficient action. The timeframe of three months for compliance with two of these Conditions was set to allow the SoH a further opportunity to demonstrate how it was addressing these concerns, ahead of its next annual renewal.
- 2.12 The SoH provided its evidence in relation to the two new Conditions as set out at paragraph 1.1 by the deadline of 21 October 2020. The Accreditation team asked for further clarification in terms of how it was handling the concerns, since our own checks revealed continuing issues with a significant number of registrants' websites. We were also concerned about whether the Society considered these to be genuine concerns, and therefore whether it was handling them appropriately.

3. The Panel's findings

Compliance with the Conditions

- 3.1 The Panel reviewed evidence submitted by the SoH in relation to the two Conditions as set out at paragraph 1.1. It also considered the relevant Standards. In summary, it found that the Conditions were not met for the following reasons:

Condition One

- 3.2 The SoH had provided updated recruitment policies and processes, and undertaken checks to assure itself of previous applicants' compliance with its *Code of Ethics* and position statements. However, it was not clear how it intended to assure itself of compliance by staff and Board members on an ongoing basis which is particularly relevant as the SoH appoints practising homeopaths to these roles. Further, the 'due diligence checks' appeared to focus narrowly on social media.
- 3.3 Given that the recruitment of the Professional Standards and Safeguarding Lead without appropriate checks was a serious oversight, this did not give sufficient confidence that the SoH would focus on public protection in its future recruitment and ongoing oversight of staff and Board members.

Condition Two

- 3.4 The SoH provided us with its policy for the escalation of complaints against registrants, which are initially handled informally. Although the policy had greater reference to social media, the Panel did not think that the policy made clear how concerns of a serious and/or complex nature would be handled with sufficient scrutiny and oversight. The SoH also provided its policy for handling *Frivolous, Persistent and Vexatious* complaints. The Panel was concerned that neither policy demonstrated how adequate focus could be assured on public protection above professional interests, and that this risked concerns not being handled in line with the *Standards for Accredited Registers*.
- 3.5 The information provided by the SoH about its handling of complaints since June 2020 indicated that it did not fully recognise the risk to patients and the public from misinformation on registrants' websites, and that it had not provided complainants who raised concerns of this nature with clear information about how they were being addressed. Also, while some steps had clearly been taken to contact registrants, and references to CEASE had been removed, the SoH's response indicated that it found references to homeopathy treating autism as acceptable.
- 3.6 Examples of registrants' websites reviewed appeared to promote homeopathy as being able to treat conditions that require medical supervision, such as depression, autism, hyperthyroidism, and arthritis. The SoH's evidence of monitoring indicated that these websites had been checked and determined to be compliant with its requirements. This raised a concern since the ASA's guidance (which is set out as a requirement in the SoH's Code of Ethics) clearly says that those practitioners who are not medically qualified should not refer to serious medical conditions.

- 3.7 As part of its own checks, the Authority asked the SoH about a concern which had been raised about the website of a practitioner listed as a SoH registrant. The SoH advised that the practitioner had been a former registrant but had resigned in 2017. The SoH corrected its register so they no longer appear as a registrant, and advised that it is carrying out checks to ensure that no similar issues remain. We would expect these issues to be fully resolved by the end of the period for suspension.
- 3.8 The response by the SoH to the complainant who had originally raised the concerns was brief and referred only to the Authority's Conditions rather than actions it was taking to consider the concerns. Although the SoH highlighted that its procedures place it under no obligation to inform a complainant of an outcome, the Panel did not think its approach was transparent or would promote confidence in the occupation it registers.
- 3.9 The Panel considered how these concerns related to the Standards, as set out below.

Protecting the public and promoting public confidence

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

- 3.10 The SoH's response to those who have raised concerns during the period under review through Condition 2 (June to Oct 2020), i.e. the Good Thinking Society (GTS) and a member of the public, did not fully address the issues raised.
- 3.11 The evidence provided by the SoH in relation to Conditions 1 and 2 does not give confidence in its ability to act on concerns about registrants, and therefore does not demonstrate a commitment to protecting the public or promoting public confidence in the occupation it registers.

Risks

Standard 3a) Has a thorough understanding of the risks presented by their occupation(s) to service users and the public – and where appropriate, takes effective action to mitigate them.

- 3.12 The Panel found that although the SoH had identified relevant risks in its risk matrix, and set out actions to mitigate them, these did not reflect the concerns identified about protection for the public. Further actions listed as mitigations such as awareness of all registrants of ASA guidance appear to be ineffective given the number of websites still advertising homeopathy as treatments for serious medical conditions.

Standard 3b) Is vigilant in identifying, monitoring, reviewing and acting upon risks associated with the practice of its registrants and actively uses this information in carrying out its voluntary register functions.

- 3.13 As above, although the risk matrix is clear in terms of documenting threats and mitigations, the recurrent nature of concerns addressed in successive Conditions indicates that actions taken to manage risks in practice have not

been effective in key areas such as complaints handling, and providing clear information to patients and the public.

Capacity to inspire confidence and manage the register

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

- 3.14 This Standard requires that ‘the organisation will need to demonstrate that its purpose and directives are focused on public protection. Additionally, the organisation will need to show that in carrying out its voluntary register functions public interest is paramount and that professional interests do not dominate or unintentionally subvert that interest.’ The approach taken by the SoH to monitoring registrants’ compliance with its position statements, and widespread issues remaining on registrants’ websites, indicate a significant tension between professional interests and public protection. The Panel did not consider that the SoH’s evidence indicated that it was prioritising the latter.

Governance

Standard 7a: Ensures that the governance of its voluntary register functions is directed toward protecting the public and promoting public confidence in the occupation it registers.

- 3.15 Whilst the SoH had provided a revised approach to recruitment and a social media policy, it did not provide a clear account of how it will assure itself that officials remain in compliance on an ongoing basis. There was also a concern that the SoH had focused on social media and not set out how other aspects of due diligence would be fulfilled.
- 3.16 Given that this was a key concern for the Panel which considered the concerns relating to the previous Professional Standards and Safeguarding Lead; there was a concern that the revised approach does not go far enough to give confidence and mitigate the risk of officials being appointed without due regard to whether they uphold the SoH’s position statements and *Code of Ethics*. Getting this right is important because an Accredited Register’s leadership, Board and key officials set the tone for the rest of the organisation and its registrants.

Setting standards for registrants

Standard 8a: Sets, requires and promotes good standards of: – personal behaviour – technical competence, – business practice (including, as appropriate: financial practice, advertising, customer service, complaints handling, work premises / environment, management and administration).

- 3.17 The ASA sets out clear requirements for homeopaths to ‘not make claims to treat medical conditions unless medically qualified and without robust evidence of efficacy.’⁷ In 2016, the ASA wrote to homeopathy practitioners across the UK to set this out and to ask that they ‘review marketing communications, including

⁷ [Health: Homeopathy - ASA | CAP](#)

websites and social media pages, to ensure they do not make direct or implied claims that homeopathy can treat medical conditions.’⁸ Although the ASA’s advertising guidance is voluntary, the ASA’s ultimate sanction is referral to Trading Standards under the Consumer Protection from Unfair Trading Regulations 2008 as the legal backstop for the ASA.

- 3.18 The SoH’s *Code of Ethics*⁹ requires compliance with the ASA’s UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code) and states at paragraph 42 that ‘members will ensure they do not allow misleading advertising and information about their practice.’ The numerous examples of registrants’ websites advertising homeopathy for conditions that require medical supervision is therefore contrary to the SoH’s own requirements as set out in its *Code of Ethics*. This indicates that actions taken by the SoH to monitor compliance by its registrants, as required by the Conditions issued in February 2020, are insufficient to mitigate the risks of patients and the public being misled. The potential harms arising from this are that patients will choose homeopathy as an alternative to medical supervision for serious medical conditions.
- 3.19 The response from the SoH to concerns raised about registrants advertising homeopathy in relation to conditions that required medical supervision indicates that the SoH does not regard those advertisements as non-compliant, despite the Authority highlighting the importance of compliance since its initial accreditation.

Standard 8e: Encourages good communication and requires registrants to provide clear information to service users to help them to make informed decisions and to make readily available information about complaints processes.

- 3.20 As above, the widespread promotion of homeopathy as a treatment for conditions which require medical supervision raises concerns that service users will not be provided with clear information that will allow them to make informed decisions about their treatments. This could lead to people not seeking appropriate treatment for conditions requiring medical supervision and using homeopathy as an alternative, rather than complementary, therapy.

Complaints handling

Standard 11a: Provides clear information about its arrangements for handling complaints and concerns about a) its registrants and b) itself.

- 3.21 The SoH had provided updated policies to meet Condition Two: a policy for escalation of complaints from informal to formal process, and a *Frivolous, Vexatious or Persistent Complaints Process*. The Panel was concerned that the scope of the policy for escalation appeared to apply to all complaints raised. It appeared that the escalation steps would be insufficient for concerns of a serious nature and that arrangements were unclear for complainants, registrants and the SoH itself.

⁸ <https://www.asa.org.uk/asset/587B3B12-F208-43A4-90A0D49AD219CDDA/>

⁹ <http://homeopathy-soh.org/wp-content/uploads/2019/07/Code-of-Ethics-2019.pdf>

- 3.22 Further, comments in response to the questions we raised on how the SoH was handling concerns raised about registrants' websites indicated that the SoH may determine that complaints such as those raised in the timeframe under review could be deemed to be 'frivolous, vexatious or persistent' under its policy. This raised a concern that complaints of the nature raised during the period of this review would not be taken seriously and addressed by the SoH.

Standard 11b: Encourages early resolution of complaints including use of mediation where appropriate and it has adequate monitoring arrangements in place to identify matters that require disciplinary action.

- 3.23 The SoH's response to concerns raised, and information provided in regards to monitoring, indicates that whereas references to CEASE have reduced, the Society's monitoring does not go far enough to mitigate the risk to the public of misinformation about homeopathy being able to treat serious medical conditions. For example, it appears to permit registrants who had previously advertised CEASE therapy to offer homeopathy treatment for autism and autistic spectrum disorder. This does not give confidence that ASA guidance is being followed or that the SoH accepts that this poses a risk to the public in terms of choosing homeopathy as an alternative for conditions which require medical supervision and can therefore mitigate it appropriately.

Standard 11d: Focuses on protecting service users and the public where necessary and putting matters right where possible.

- 3.24 The SoH's response to those who had raised concerns in the timeframe under review was brief and referred to the Authority's review of its Conditions. This falls short of addressing the concerns and does not provide adequate information to the complainant. Although it is acknowledged that many of the concerns were raised by a single organisation, and not by anyone who had received treatment from or been directly affected by the actions of a SoH registrant, the Authority found the nature of the concerns raised to be valid. The Panel had concerns that the SOH does not recognise this and has not gone far enough to put matters right on behalf of those who are at risk of misinformation.

11e) Makes sound decisions that are fair, transparent, consistent and explained clearly.

- 3.25 The Panel found that this element of the Standard was also not met, as it was not clear how concerns had been addressed during the timeframe under review. The Panel did not consider that the SoH's revised policies allowed for consistent or clear review of concerns raised. The Authority had observed an adjudication hearing for a SoH registrant during the timeframe of the review, where concerns of the nature raised in this report were considered. However, the Panel considered the wider concerns that had apparently not been fully addressed by the SoH in coming to its conclusion on this Standard.

4. Suspension

- 4.1 Having concluded that the Conditions had not been met, and that six of the 11 Standards were not met, the Panel considered what outcome would be

proportionate. In doing so it considered the nature of the key risk, which was that public protection is not reflected as the primary focus of the SoH's governance and complaints handling processes. This has caused risks to the public, such as that of misleading information being provided to patients and service users by SoH registrants, which could lead to patients choosing homeopathy as an alternative for conditions that require medical supervision. There was a significant concern that the SoH did not recognise this risk and had not as a consequence taken steps to adequately address it.

- 4.2 The Panel considered the range of options available to it: extending the timeframe of the Condition(s), issuing one or more new Condition(s), suspension and withdrawal of accreditation.
- 4.3 Given that the SoH had previously been given the opportunity to mitigate the risks identified by the Authority through monitoring and taking actions where registrants were not compliant with its requirements, as set out in previous Conditions, the Panel decided that extending the timeframe and/or issuing further Conditions would be unlikely to be effective.
- 4.4 The Panel decided that on the basis of the evidence before it, suspension for 12 months (or sooner if the SoH can demonstrate it has fulfilled the Conditions and meets all of the Standards) was a proportionate outcome. Accreditation should be suspended until the SoH can demonstrate that it is taking appropriate action to ensure its registrants are compliant with its *Code of Ethics* and position statements, and that the SoH has adequate mechanisms in place to take prompt and effective action where it is made aware of actual or potential non-compliance. It would be important for the SoH to demonstrate it can maintain those mechanisms over a period. The Panel considered that should this be achieved this would lead to significantly clearer and more accurate information being provided to patients and service users, which would better enable them to make informed choices about their healthcare.
- 4.5 The Panel considered whether accreditation should be withdrawn. The Panel noted that withdrawal of accreditation was a final step and considered that it would be proportionate to provide the SoH with a final opportunity to meet the Standards.
- 4.6 The Panel agreed that the SoH would need to meet the following Conditions for suspension to be lifted:
 1. Demonstrate that it has sought as far as reasonably possible to ensure compliance of its registrants with its Code of Ethics (including Advertising Standards Authority (ASA) requirements), and position statements over a period of at least six months. As part of this the SoH must demonstrate that it has taken action to identify and address instances of non-compliance, to the satisfaction of the Authority.
 2. Ensure that it has appropriate separation in place between its functions of protecting the public and supporting professional interests. A clearer focus on public protection must be reflected and applied through its key functions, including:
 - a. Governance
 - b. Setting of standards

- c. Complaints handling
 - d. Provision of information by the SoH to the public.
- 3. Demonstrate through these arrangements and its decisions that it has a clear focus on public protection when considering matters related to the practice of homeopathy by its registrants.
- 4.7 Whilst we would expect the SoH to consider the points raised in this and earlier reports to satisfy these requirements, it should not limit itself to these. Fully addressing the points above will require the SoH to reflect on how it can demonstrate a focus on public protection, as required to meet the *Standards for Accredited Registers* and in doing so it might identify further actions.
- 4.8 Unless the SoH provides evidence against these Conditions earlier, its accreditation will be reviewed after 12 months of notification of suspension. As well as meeting the Conditions, the SoH will need to undergo an assessment against all of the Standards for accreditation to be renewed. If the Authority introduces any new processes for accreditation renewal during this time, as proposed through our current public consultation¹⁰ on the future of the programme, we will write to the SoH to inform of its updated requirements. If the Authority determines that the SoH has met the Conditions and Standards, then suspension will be lifted and accreditation renewed. If the Authority determines that the SoH has not met the Conditions and Standards, then at this point a Panel is likely to consider withdrawal of accreditation if there are not mitigating circumstances.
- 4.9 The SoH will have opportunity to submit evidence of progress at interim reviews. These will take place every three months during the 12 month suspension. The SoH will be asked to provide evidence of how it is addressing the outstanding Conditions on 11 April, 11 July and 11 October 2021. Final evidence will be due on 11 January 2022. If the SoH can demonstrate to the satisfaction of the Authority that the Conditions have been met, then the Authority may bring forward the assessment of how the SoH meets the Standards, so that suspension can be lifted earlier than the 12 months.
- 4.10 The Panel considered the impacts of suspension in relation to patients, service users, the SoH as an organisation, SoH registrants, and employers. It considered the protected characteristics set out under the Equality Act 2010. It did not identify any impacts that prompted a re-consideration of suspension. It decided that suspension to allow a final opportunity for the SoH to address concerns was likely to provide an incentive for the SoH to ensure compliance by registrants with its *Code of Ethics* and position statements.
- 4.11 Suspension will take effect on 11 January 2021. The SoH and its registrants will not be permitted to use the Accredited Registers quality mark at any time on or after that date until the suspension is lifted. The Authority's website and other publications will be updated to note the suspension and this report will be published on the SoH's directory page and on our Accreditation Decisions¹¹

¹⁰ <https://www.professionalstandards.org.uk/news-and-blog/latest-news/detail/2020/06/08/the-authority-announces-a-strategic-review-of-the-accredited-registers-programme>

¹¹ <https://www.professionalstandards.org.uk/what-we-do/accredited-registers/read-our-assessments/panel-decisions>

page. In line with our *Publications Policy*,¹² any appeal lodged by the SoH will also be published alongside this report until such time as the appeal is concluded. The Accredited Registers Appeal Policy is available on our website.¹³ Suspension of accreditation can be appealed. The grounds for appeal are that the Authority:

- Acted outside or beyond its powers
- Did not follow proper procedure
- Acted irrationally.

4.12 An appeal must be lodged in writing by email with the Chair of the Authority's Board within 10 working days of a formal notification of an Accreditation Panel's decision. This should be submitted to the Authority's appeals email address: appeals@professionalstandards.org.uk. The subject line of the email should contain the name of the organisation submitting the appeal.

4.13 The appeal should be submitted on the Appeal Form¹⁴ and must:

- Set out the decision that is being appealed
- Set out clearly the grounds and reasons for appealing the decision
- Include all supporting documentation.

¹² https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/guidance-documents/accredited-registers-publications-policy.pdf?sfvrsn=30427220_8

¹³ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/resources-page/180626-ar-appeal-policy-v1-0.pdf?sfvrsn=445e7220_4

¹⁴ <https://www.professionalstandards.org.uk/what-we-do/accredited-registers/resources>

Appendix 1

Conditions issued in February 2020

1. The Society of Homeopaths must:
 - a) make its position statements clear that registrants must not practise or advertise adjunctive therapies that are incompatible with Society registration. Specific reference must be made to the Society's position forbidding the practice of CEASE, and dietary/nutritional supplements. This must be submitted to the Authority for review and published within three months. (Met June 2020)
 - b) make its position statements clear that registrants' scope of practice does not allow registrants, whether acting in a professional or public capacity, to provide advice on vaccination or offer or provide homeopathy as an alternative to vaccination for the prevention of serious infectious diseases. Registrants should direct service users to NHS and other public health sources, for example, their GP or public health departments. Revised statements must be submitted to the Authority for review and published within three months. (Met June 2020)
 - c) provide quarterly reports of its monitoring to ensure that within the following 12 months all registrant websites comply with its updated position statements (as referred to in part a above) (paragraph 5.10)
 - d) complete and make available to the public its guidance on adjunctive/supplementary therapies and inform the Authority how it will promote compliance with that guidance.

Conditions issued in July 2020

1. The Society must ensure that its recruitment processes include appropriate due diligence checks to assure itself that applicants are, and have been, in compliance with the Society's Code of Ethics and position statements, including those relating to the use of social media. This should apply to all paid and voluntary positions within the Society including Board and staff members. The Society should also ensure that it has processes in place to assure itself that officials of the Society remain in compliance after appointment. The Society must report to the Authority on the steps it has taken to comply with this condition within three months.
2. The Society must provide the Authority with its policy for the escalation of complaints against registrants, which are initially handled informally, into its formal processes and its procedures for handling persistent complainants. The Society must also provide a summary of complaints received since the publication of its new position statement on 10 June 2020 (including those handled through an informal route) and outcomes to the Authority. This should be completed within three months.
3. The Society must:
 - a) monitor its registrants' use of social media to ensure that they are complying with its position statements. The Society should provide quarterly reports to the Authority.

b) review, and if necessary, update its social media policy for registrants, ensuring consistency of guidance to registrants on the content of their own websites, and their statements and actions on others' websites and other social media. This should be completed within six months.