

Accredited Registers Programme

In-Year Review of Society of Homeopaths (August 2020)

1 Outcome

- 1.1 The Panel met on 13 August 2020 to consider the information provided as part of an in-year review of the Society of Homeopaths (the Society). The Panel recognised the concerns raised, however felt that they could be addressed through the previously issued Conditions. The Panel decided that it would not be proportionate to take further action at this time. However, the Panel wished to make clear that the Authority expected that the Society had a leadership role in demonstrating whole-hearted endorsement of the Authority's view that advertising or undertaking Completed Elimination of Autistic Spectrum Expression (CEASE) therapy or putting across anti-vaccination messages posed a risk to public health and were not compatible with membership of an Accredited Register. The Authority would be assessing the Society's approach to this in the event that the Society sought reaccreditation.

2 Background

- 2.1 The Society of Homeopaths was accredited by the Authority as one of its Accredited Registers in 2014. In 2017, the Authority became concerned about the approach taken by some of the Society's registrants to CEASE therapy and vaccinations. Between then and 2019, the Authority issued Conditions for the Society which were intended to address those concerns. As part of the reaccreditation process in February 2020, the Authority imposed four further Conditions.
- 2.2 On 10 June 2020, the Authority announced that the Society had met two of the four Conditions that were imposed on its reaccreditation in February 2020. Compliance with the further two Conditions was ongoing and is due to be considered as part of the Society's annual review. The Conditions met by the Society required it to publish position statements that make clear that registrants must not practise or advertise therapies outside of their scope of practice and which forbid practice of CEASE or the provision of homeopathy as an alternative to vaccination.
- 2.3 On 11 June 2020, we were made aware that the Society's recently appointed Safeguarding Lead had posted content online that was in apparent contradiction to the position statements issued by the Society.
- 2.4 The Authority investigated this as part of an 'in-year review'. The Panel which met on 9 July 2020 found that the Society had taken action to mitigate the immediate risk, including removal of the media posts and acceptance of the resignation of the Safeguarding Lead. Accordingly, the Panel concluded that

suspension of the Society's accreditation would be disproportionate. However, three new Conditions were imposed which focused on more robust recruitment processes and social media guidance. The report from this Panel meeting with full detail of the Conditions can be found [here](#).

3 Concerns raised July 2020

- 3.1 On 30 July 2020 the Society reported to the Authority that its interim Chief Executive Officer (CEO) had resigned. The Authority was concerned that the fact that two senior posts were vacant might mean that the Society was unable to take the actions that would enable it to meet the new Conditions.
- 3.2 In addition, the Authority became aware that a particular registrant appeared to still be advertising and practising CEASE, despite us bringing this registrant to the attention of Society in February 2020. On further investigation, we discovered that 32 Society registrants were listed as CEASE practitioners (around a third of the total listed for the UK) on the cease-therapy.com website. Although this website is not run by the Society or any of its members directly, the inclusion of Society registrants on the website raised concerns about the effectiveness of the actions being taken by the Society to ensure its registrants comply with its position statements. The Accreditation team looked at the websites of those individuals and noted concerns about the content of six of them.
- 3.3 The Authority requested further information from the Society by letter dated 30 July 2020. The Society provided its response to the Authority on 4 August 2020 and further clarifications on 5 August 2020. Following the decision of a Moderator on 7 August 2020 further information was sought. It was provided by the Society on 12 August 2020.
- 3.4 The Moderator considered whether the information provided raised public protection concerns, concerns about the Society's ability to meet the Conditions previously set and whether it impacted any of the [Standards for Accredited Registers](#).
- 3.5 The Moderator noted that a new interim CEO was temporarily filling the gap in leadership at the Society. However, they noted that there remains a concern that the turnover of staff at this level within the Society over the past year impacts on the Society's ability to inspire confidence in managing its register effectively. The Moderator also noted that one of the Conditions from the previous investigation within the in-year review related to the Society's recruitment processes and that, while the CEO position had been filled on a temporary basis, the Society had not provided any additional information or assurance about its processes or the due diligence checks it had carried out in making that appointment.
- 3.6 The Moderator considered the messaging provided by the Society to its registrants about its new position statements and noted that there appeared to be inconsistencies between the messages the Society was giving to its members and the content of its position statements. This raised the question about whether the Society has made an effective distinction between professional and public interest, and properly prioritised the latter. The Authority expects public protection to be the main focus for its registers.

- 3.7 There was concern that materials provided to members by the Society failed to adequately recognise the concerns raised about CEASE and anti-vaccination as valid risks to public protection. This, combined with a further change in leadership, could undermine confidence in the ability of the Society to ensure compliance with the position statements.
- 3.8 The Moderator noted that some registrants still appear to be on the CEASE website. The Moderator acknowledged that this is a third-party website and therefore its content is outside the control of the Society. The Moderator also noted the actions the Society reported it has taken to try to rectify this and what it proposes to do going forward. There does, however, remain a concern that Society registrants are still being displayed on this website as offering CEASE.
- 3.9 The Moderator considered the results of the monitoring provided by the Society in May 2020 as part of Condition C issued in February 2020. The Moderator noted that it was not clear at which point further action would be taken against registrants but also that this was the subject of one of the Conditions issued at the recent in-year review.
- 3.10 Having considered all the information available, the Moderator noted that there were questions over the Society's ability to inspire confidence in its management of the register, particularly given the changes in its leadership. There also remain questions as to whether the Society's focus is on public protection. This could also potentially bring the programme into disrepute and reduce overall impact of the Quality Mark.

4 Panel Discussion

- 4.1 The Panel was asked to consider whether the new information impacts on the previous Conditions and whether any of the Standards are impacted. The Panel was also asked to consider if this brings into question confidence in the Society's ability to manage the register.
- 4.2 The Panel considered the information provided and noted that the Society had recruited a new interim CEO and that it had provided plans for the recruitment of a permanent CEO. It had arranged for another member of staff to extend her work to cover the work of the Safeguarding Lead. This suggested that the Society had taken action to address both vacancies and had done so in a way which was not obviously unreasonable. The approach did not currently suggest that the Standards were not met. The Panel noted that the Society's leadership and governance will be considered as part of the Society's next annual review where the Society will be expected to demonstrate that the changes in the key roles inspire confidence in its ability to run the register as part of the Standards.
- 4.3 The Panel considered the information provided about the Society's monitoring of its registrants' websites. It noted that the current open Conditions required the Society to monitor its registrants' websites and complete this by February 2021, and to monitor their social media presence. The Society was required to provide quarterly progress reports to the Authority and had provided its first report to the team covering March to May 2020. The Panel also noted that the Accreditation

team will be carrying out its own monitoring of Society registrants' on-line presence.

- 4.4 The Panel noted that the individual website that had been drawn to the Panel's attention had been amended and now appeared to comply with the statements. The Panel did not see the evidence of the other sites that had caused the Team concern. However, it noted that there was a very small number of these and that there were still some months in which the Society had time to address these concerns.
- 4.5 The Panel noted that the Society seemed to be looking at its register alphabetically. This raised some concerns that the Society was not prioritising the risks appropriately, such as that which may be posed by those who appear on the third party CEASE website (cease-therapy.com). However, the Authority had taken the view that it was not its role to direct the Society about the detail of how it should comply with the Conditions.
- 4.6 The Panel was concerned that some registrants were still being listed on the third-party website. It recognised that the content of some third party websites might be outside of the control of the Society and its registrants but would expect the Society to seek evidence from its registrants that they are trying to get themselves removed and that they have taken other reasonable action to mitigate the risk, for example by making it clear on their own sites that they no longer offer such therapy. The Society's monitoring should take account of its registrants' on-line identity as a whole and not just concentrate on practice websites and social media.
- 4.7 While recognising the concerns, the Panel considered that the Society was still subject to Conditions and had some months in which to comply with them. The effectiveness of the Society's actions could be judged when the period for the Conditions had been completed.
- 4.8 The Panel noted the communications by the Society to its members. It was concerned that the tone of these communications may indicate that the Society did not see the issues raised as a significant as the Authority does. However, it also recognised that there were significant differences of opinion within the Society's membership and that it was open to the Society to have a debate about whether it wished to be part of the Accredited Registers scheme or not. While the Panel was disappointed that the leadership of the Society was not more emphatic in endorsing the Conditions, it recognised that there was a spectrum of reasonable ways to put the message across and it did not consider that the Society's communications went so far as to undermine its position statement.
- 4.9 However, the Panel confirmed that there are clear public health reasons why it is wrong for practitioners to endorse the practice of CEASE, anti-vaccination messages or otherwise suggest that homeopathy should be used as an alternative to recognised medical interventions. The Authority expects all Accredited Registers to take a proactive leadership role in ensuring that its registrants are meeting its standards and considered that, if the Society does decide to continue to seek to be part of the register, it needs to demonstrate that its leadership fully supports both the spirit and the letter of its statements. The Authority can look at this question again as part of the next reaccreditation round.

Appendix 1: List of conditions

Condition	Date Issued	Deadline	Met or Open
<p>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.</p>	<p>13 February 2020</p>	<p>29 May 2020 (following a short, agreed extension)</p>	<p>Met</p>
<p>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.</p>	<p>13 February 2020</p>	<p>29 May 2020 (following a short, agreed extension)</p>	<p>Met</p>

<p>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)</p>	<p>13 February 2020</p>	<p>13 February 2021</p>	<p>Open</p>
<p>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.</p>	<p>13 February 2020</p>	<p>9 January 2021</p>	<p>Open</p>
<p>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</p>	<p>21 July 2020</p>	<p>21 October 2020</p>	<p>Open</p>

months of the date of this letter.			
<p>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 of the date of this letter.</p>	21 July 2020	21 October 2020	Open
<p>3. The Society must:</p> <p>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.</p> <p>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</p>	21 July 2020	21 January 2021	Open

on others' websites and other social media. This should be completed within six months of the date of this letter.			
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