

## Accredited Registers Programme

### In-Year Review of Society of Homeopaths (July 2020)

#### 1. Outcome

1.1 Following an in-year review initiated when concerns were raised in June 2020 about the Society of Homeopaths (the Society), a Panel met on 9 July 2020 and decided to issue further Conditions to the Society:

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 of the date of this letter.
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.
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 of the date of this letter.

#### 2. Background

2.1 In February 2020, the Panel renewed the Society's accreditation with four Conditions. The four conditions were that the Society 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.

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.

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)

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.

2.2 Conditions (a) and (b) had a deadline of three months. The Society provided its statement to the Authority within the required timeframe, following an extension of 16 days as agreed in a letter issued to the Society on 4 May 2020. The Panel met on 8 June 2020 and found that Conditions (a) and (b) were met. The Society's updated statement is published online. The Authority published a web statement on 10 June confirming these two conditions had been met.

2.3 Conditions (c) and (d) are ongoing and will be assessed as part of the Society's next annual review.

### **3. Investigation of concerns raised in June 2020**

3.1 On 11 June 2020, the Authority received information through its Share Your Experience process that the recently appointed Safeguarding Lead of the Society (who is also a registrant) had apparently published social media posts that might contravene the Society's position statements, and its wider standards and Code of Ethics.

3.2 The Authority raised the concerns with the Society and began an investigation on 12 June 2020. The Authority undertook a social media audit and found material on the Safeguarding Lead's social media, and the Society's own social media accounts, which appeared to contravene its Code of Ethics and recently published position statements, and the Cancer Act 1939. Some of the posts were within the past six months and included material that could be considered anti-vaccination and promoting treatments for specified conditions, including cancer and Covid-19. In accordance with its processes, the Authority asked a Moderator to consider the evidence and decide whether further investigation or other action was warranted.

3.3 The Moderator determined that Conditions (a) and (b) remained met, as the requirement was to make the Society's expectations of registrants on CEASE and vaccination clear through its updated position statements. The Moderator

also determined that actions taken by the Society once the concerns had been raised, which included the social media posts being removed, were sufficient to mitigate the immediate risk of misinformation to the public.

- 3.4 Although it was not deemed necessary to convene an immediate Panel to consider the Society's accreditation status, the Moderator determined that the events highlighted concerns about the Society's compliance with the Standards for Accredited Registers, and requested that a targeted review should be undertaken to allow further investigation of evidence relating to:
- a) Standard 2: the organisation demonstrates that it is committed to protecting the public and promoting public confidence in the occupation it registers.
  - b) Standard 5: the organisation demonstrates that it has the capacity to inspire confidence in its ability to manage the register effectively.
  - c) Standard 7a: the organisation ensures that the governance of its register functions is directed toward protecting the public and promoting public confidence in the occupation that it registers.
  - d) Standard 8a: the organisation sets, requires and promotes good standards of personal behaviour, technical competence and business practice.
  - e) Standard 8e: the organisation 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.
- 3.5 The Authority notified the Society of the targeted review and asked it to provide further evidence about its recruitment processes, actions it had taken in response to the concerns, and the impact it considered the posts to have on public confidence. The Society responded within the agreed timeframe.

#### **4. Panel Discussion**

- 4.1 The Panel met on 9 July 2020 to consider the evidence, including the Society's response to the Authority's questions. The Society also gave verbal evidence to the Panel, where it reiterated its written response but did not add any new substantive points.
- 4.2 The Panel agreed with the Moderator's assessment that Conditions (a) and (b) could be considered met. However, in relation to the new concerns, it considered that although the actions taken by the Society to mitigate the immediate risk were in place, the evidence presented raised continuing concerns about public protection (Standard 2) the Society's ability to inspire confidence (Standard 5) and its governance (Standard 7).
- 4.3 The Panel expressed its serious concerns that, very soon after the Society's accreditation had been renewed with conditions designed to ensure registrants' compliance with core requirements of practice, the Society had appointed to a critical position a person who had recently published statements at clear

variance with those requirements. This inevitably called into question the Society's ability to comply with the Standards for accreditation.

- 4.4 The Panel considered all the options available to it. It was decided that suspension of accreditation would not be proportionate, given the actions the Society had put in place to contain the risk and address the related issues. This included requesting and accepting the resignation of the Safeguarding Lead. The panel also considered that conditions could be formulated to address the remaining concerns.
- 4.5 In making its decision, the Panel considered the impact of its decision on the public, service users, and the Society's registrants (and those who employ them). It agreed that the most effective way to ensure that the Society's registrants comply with the position statements, and for patients and the public to be protected, was additional Conditions which would set out clear and strict requirements with which the Society must comply by the deadlines set. A Condition is a change that must be implemented within a specified timeframe to maintain accreditation and is issued when a Standard has not been met.

#### *Condition 1 – recruitment policies*

- 4.7 The Panel considered the Society's proposals to change its recruitment policies. The Panel considered that it was essential that members of the Society's staff team and its Board demonstrably uphold the Society's standards. It is important that the Society undertakes due diligence about this through checks conducted during its recruitment processes and also on an ongoing basis to ensure that compliance is maintained.
- 4.8 The Panel decided to issue Condition 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 of the date of this letter. (Deadline 21 October 2020)**

#### *Condition 2 – complaints handling*

- 4.9 The Panel considered the Society's processes for handling complaints about its registrants' websites and social media content. The Panel noted that the Society had received twenty-one complaints about its registrants' compliance with its new position statements. The Panel noted that it was not for the Panel to comment on how individual complaints were being handled as these cases were ongoing and it is the Authority's policy not to get involved in ongoing complaints.

- 4.10 The Panel noted comments from the Society during verbal evidence that it was the Society's [policy](#) to deal with such concerns in an informal way by, for example, contacting a registrant regarding advertising that is in breach of its Codes and working with them to put it right, before initiating its formal complaints procedures or referring to Trading Standards. The Society has previously stated that it will accept concerns from any source, all concerns are acknowledged and acted on, but outcomes are not provided to the party raising the concern if it has been handled through an informal process. It was unclear to the Panel, however, how the Society escalated concerns from an informal route to a formal route where that was justified, or how it handled persistent complainants.
- 4.11 The Panel decided to issue Condition 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. (Deadline 21 October 2020)**

### *Condition 3 – social media policy*

- 4.12 The Panel noted the Society's proposals to update its social media policy to give it more of a public protection focus and noted that this had been issued as a Recommendation to the Society at its last annual review in February 2020. The Panel agreed that the concerns raised about the Safeguarding Lead and the Society's handling of this process, could give rise to concerns about its ability to inspire public confidence in its management and governance of the register. This placed further importance on the need for clear guidelines to its registrants. The Panel decided to replace the previously issued Recommendation with a new Condition 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 of the date of this letter. (Deadline 21 January 2021)**

## **5. Monitoring compliance with the Conditions**

- 5.1 The Society must comply with the Conditions within the set timeframe. The Authority will also undertake its own monitoring of compliance, which will

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include audits of registrants' webpages and social media accounts. The aim of this is to ensure confidence in the Society's monitoring processes, which is justified by similar concerns being raised in successive re-accreditation reviews.

- 5.2 Although the Authority recognises the challenge for registers in ensuring compliance by its registrants, given the nature of the concerns raised we consider that for the Society to maintain accreditation in the future it is essential that it must instill confidence about its ability to monitor and take action on non-compliance with its position statements, Code of Ethics, and other requirements for registration. We would also highlight that the potential for misinformation on vaccination is a heightened risk due to Covid-19.