

Society of Homeopaths outcome of in year review

Q&A

August 2020

1. Why hasn't the PSA removed the Society's accreditation?

During its in-year review of the Society the Panel decided that, given the actions taken by the Society to address the issues raised, removal of accreditation would be disproportionate. When fresh issues came to light after the initial decision was taken, we reconvened a Panel to review whether further action needed to be taken. However, the Panel concluded that there wasn't enough evidence at this time to warrant suspension or removal of accreditation. Instead it was decided that we would continue to monitor the Society's adherence to the Conditions placed upon it in the in-year review and make clearer our expectations in terms of registrant monitoring, and leadership.

2. Why was suspension not considered a proportionate outcome?

After the in-year review of the Society in July 2020, the panel decided that suspension of accreditation would not be proportionate, given the actions the Society had put in place to mitigate 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. When fresh issues came to light after the initial decision was taken, we reconvened a Panel to review whether further action needed to be taken. However, the Panel concluded that there wasn't enough evidence at this time to warrant suspension. Instead it was decided that we would continue to monitor the Society's adherence to the Conditions placed upon it in the in year-review and make clearer our expectations in terms of registrant monitoring, and leadership.

3. Does rescinding of accreditation remain an option?

We will assess appropriate and proportionate action to be taken once we have fully assessed the Society's ability to comply with Standards of Accreditation and the additional Conditions we have set out, in the given time frame.

4. How will the Authority assess whether conditions have been met? What methods and metrics will it use?

The Authority will undertake its own assessment of compliance with the Standards of Accreditation and the additional Conditions placed on the Society, which will include audits of registrants' webpages and social media accounts.

5. How has the Society responded to the decision? Will it appeal the decision, and will this be a legal process?

The Society has fact checked the reports and has not indicated that it intends to appeal. The Society has until 1 Sep to inform the Authority if it intends to appeal the second report, but it previously indicated that it would not appeal the set of

Conditions laid out in the first report. The appeal process is heard by the Chair of the Authority, for reference the process can be found on the resources page of our [website](#). Appeals are only open to the Society.

6. Why did the Authority consider it appropriate to accredit the Society in the first place, given concerns and criticism about the efficacy and scientific basis of its treatments and practices?

The Society was accredited as it demonstrated that it met our Standards for Accredited Registers. The Authority does not make judgements on the efficacy of treatments or therapies, this is a matter for the NHS, employers and service users.

The Accredited Registers programme sets standards for organisations holding registers of people working within health and social care. The Authority independently and rigorously assesses every organisation before they become accredited to ensure the public is protected when choosing and using health and care services.

Later this year the Authority is holding a strategic review of its Accredited Registers programme. This will be a full and comprehensive review of the programme that will assess the extent to which the programme has achieved its original aim, and make recommendations for the future shape of the programme.

7. Why did the Authority decide to reconvene a panel after the initial in-year review?

After the panel reached its decision on 9th July, new information came to light which was cause for concern regarding the Society's ability to meet the Conditions placed upon it. The Authority took the decision to reconvene a panel to review the fresh evidence and decide whether the Society was still able to meet the Standards of Accreditation and the new Conditions placed upon it in the in-year review.

8. What was the basis for the new concerns which caused the Authority to reconvene a panel?

On 30 July 2020, the Society reported to the Authority that its interim CEO had stepped down.

We were concerned that the challenges around recruiting for this role and that of Safeguarding Lead may have an impact on the ability of the Society to meet the ongoing Conditions for accreditation, and to put into place actions that would enable it to meet the new Conditions.

In addition, the Authority became aware that a registrant appeared to still be advertising and practising CEASE, despite being highlighted to the Society by us in February 2020.

On further investigation, we also discovered that other Society registrants were listed as CEASE practitioners on the cease-therapy.com website. Although this

website is not run by the Society or any of its members directly, this raised concerns about the sufficiency of actions being taken by the Society to ensure its registrants comply with its position statements regarding the practice or advertisement of adjunctive therapies.

9. Did the Authority notify the Society about the new concerns raised, and did it give the Society a chance to respond to these concerns? If so, what was the Society's response?

We notified the Society about the new concerns raised in a letter on 30th July. They subsequently responded to our request for further information on the 4th August. However, the response did not fully address our concerns and we therefore reconvened a panel to examine the evidence further.

10. Is it not in the interest of public safety to remove the accreditation of the Society given your concerns?

The safety of the public is always the main priority in any decision the Authority takes. We have reviewed all the evidence and have taken the decision which we felt was the right one in this situation. We will continue to monitor the Society's ability to comply with the Standards of Accreditation and the additional Conditions placed upon it.

11. Why were the new concerns not brought to light in the initial investigation?

These were concerns that came to light after the review Panel reached its decision on 9th July. We responded rapidly and fully to these issues once they emerged, subsequent to the conclusion of the initial in-year review, by reconvening a panel.

12. Why was the question of a replacement Safeguarding Lead not considered in the initial investigation? Did the panel raise concerns about the Society's registrants' use of social media?

In the first review the Panel expressed concerns about the Society's recruitment policies and set out a Condition which required them to be improved. The second review was initiated because it was highlighted that there were two vacancies (the Safeguarding Lead and the CEO) and that this could have an impact on the Society's ability to meet the Conditions placed upon it. The second Panel felt the actions taken by the Society to temporarily fill these two roles were sufficient for the time being, and also considered that the initial time frame for compliance with the Condition on recruitment had not yet expired.

Concerns were raised about registrants use of social media in the first review and the Panel set out Condition 3 which required improvements to the monitoring of social media. This Condition was reiterated after the second review.

13. What was the content of the posts on social media? How long were they visible to the public, and how quickly were you alerted to them and respond?

The Society published its updated position statements on 10 June. The Authority received concerns about the social media posts on 11 June and immediately

investigated these concerns. We wrote to the Society on 15 June following this investigation. The Twitter account for the Safeguarding Lead was removed on 17 June and the website content regarding Covid-19 advice was removed on 18 June.

The content of the social media posts was in contradiction to the Society's position statements on adjunctive therapies, including suggestions that homeopathy could be used to treat Covid-19, comments on vaccination and the suggestion that the use of thermography could replace mammograms.

What does the Authority consider the impact of the Society's staff and registrants' tweets to be? Isn't it clear that irreparable damage has been caused to public trust by the spreading of misinformation, particularly during the COVID-19 pandemic?

In the June review, our appointed Moderator decided that the actions taken by the Society, including the removal of the social media posts, was sufficient to mitigate the risk to the public posed by the misinformation. However, we absolutely recognise the potential risk posed to the public by misinformation about vaccinations, particularly in the context of the COVID-19 pandemic. All registrants must ensure compliance with Society registration conditions, including the Society's forbiddance of practicing CEASE.

14. You say that you will now monitor the Society's social media activity – why did you not do this before? And how do you plan to go about it now?

We periodically sample the communications of Accredited Registers as part of our ongoing monitoring. We will be carrying out spot checks of the Society's registrants' websites and social media content.

15. Do you think the Accredited Registers programme is robust enough and what will you do to reassure public confidence in the programme?

Yes. The Accreditation team carry out rigorous assessments of these registers against demanding standards in a number of areas including protecting the public, complaints handling, governance, setting standards for registrants, education and training, and managing the register. This provides the public with assurance that the organisation holding the register meets our standards. This means that they manage their register well and require practitioners on their register to meet specific standards of personal behaviour, technical competence and, where relevant, business practice.

The Accredited Registers programme is an important source of information for members of the public. Accredited registers help people get better care by ensuring that the health practitioners they register are competent and trustworthy. The programme protects the public's interests and wellbeing, helps them make informed decisions and instils confidence about their practitioners.

The Authority is holding a strategic review of its Accredited Registers programme. This will be a full and comprehensive review of the programme that will assess

the extent to which the programme has achieved its original aim, and make recommendations for the future shape of the programme.

This is an important opportunity to take stock, listen to our stakeholders and the public in a full consultation process, and improve how the programme works for them.

16. Do you think you should take a view on the efficacy of the bodies under your accreditation, as otherwise you potentially undermine public trust?

The Authority intends to hold a strategic review of the Accredited Registers programme this year. It is the first comprehensive review of the programme since its creation in 2012. The review will include an examination of the scope of the programme and whether the Authority's criteria for inclusion or exclusion of occupations are sound. It is anticipated that this will be a rapid review with preliminary options agreed by late summer.

17. Do you defend the practise of Complete Elimination of Autistic Spectrum Expression (CEASE)?

We do not advocate or defend the practise of CEASE. As such, we recognise the concerns that misinformation could pose a risk to the public. We have been monitoring how the Society manages the risk of misinformation since its initial accreditation in 2014. Earlier this year, we issued a Condition to the Society that requires it to make its position statements clear that registrants' scope of practice does not allow them to practise or advertise adjunctive therapies that are incompatible with Society registration, and that specific reference must be made to the Society's position forbidding the practice of CEASE, and dietary/nutritional supplements. Members of the Society must follow this position statement, and if not, the Society can take action against them.

18. Do you support anti-vaxxers?

We do not support anti-vaccination groups or homeopathy as an alternative form of vaccination. We recognise the concerns that misinformation about vaccines could pose a risk to the public, particularly in the context of the COVID-19 pandemic. We have been monitoring how the Society manages this risk since its initial accreditation in 2014.

Earlier this year, we issued a Condition to the Society that requires it to make its position statements clear that registrants' scope of practice does not allow them to provide advice on vaccination or offer or provide homeopathy as an alternative to vaccination for the prevention of serious infectious diseases. Members of the Society must follow this position statement, and if not, the Society can take action against them.

19. Have NHS England, Department of Health or the regulator raised concerns about the Society's suitability for accreditation with the PSA?

Yes, the NHSE CEO raised concerns about the Society and these were taken into account as part of the last annual review. We will continue to communicate with NHSE and other stakeholders as part of the strategic review.