

# Condition Review: Institute of Trichologists (IOT)

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## 1. Outcome

- 1.1 Following **our review of Conditions issued to the Institute of Trichologists (IOT)** which concluded in July 2025, the Professional Standards Authority ('we') issued 3 Conditions on its accreditation, to be completed by 4 December 2025 (see paragraph 1.2 of the published outcome).
- 1.2 This report sets out our assessment of the actions taken by the register to satisfy the Conditions.
- 1.3 We found that the IOT had met the Conditions.

## 2. Background

- 2.1 We assess registers against our Standards for Accredited Registers ('the Standards')<sup>1</sup>. Where a Register has not met a Standard, we can issue Conditions. A Condition sets out the requirements and the timeframe that a Register must meet.
- 2.2 At the IOT's previous review Conditions in July 2025, we issued 3 further Conditions (a full list is published in the report **from that assessment**. The Conditions had to be implemented by 4 December 2025.

**Condition One:** The IOT must review and update its appeals process for complaints outcomes to ensure it is clear to all parties. Appeals panels must include independent lay members, exclude Board Directors, and ensure decision-makers have not previously been involved in the complaint.

**Condition Two:** The IOT must make clear that it will assume responsibility for investigating and prosecuting complaints, clarifying complainants' role as witnesses rather than presenting their own cases in formal hearings.

**Condition Three:** The IOT must review and update its complaints handling policies and procedures to ensure consistency across all documents and clarify processes for appeals, interim orders, and other technical aspects. The IOT must also ensure appropriate separation of decision-making roles and establish clear thresholds for

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<sup>1</sup> Standards for Accredited Registers, 2023 edition:

[www.professionalstandards.org.uk/publications/standards-accredited-registers](http://www.professionalstandards.org.uk/publications/standards-accredited-registers)

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progressing complaints from investigation to adjudication

2.3 This report discusses the actions the IOT took to address the Conditions, as well as our decision about whether the Condition is met.

2.4 We reviewed the following evidence:

- The IOT's reported actions about what it had done to meet the Conditions
- Updated policies following queries we raised

### 3. Concerns leading to the Condition

3.1 At the July 2025 condition review, we identified concerns about the Institute of Trichologists' (IOT) arrangements for handling complaints and appeals under **Standard Five: Complaints and concerns about registrants**. These issues had the potential to affect patients, complainants and registrants, and to undermine confidence in the complaints process.

3.2 In particular, we found that:

- **Appeals arrangements were not sufficiently independent.** The IOT's policies allowed Board Directors to sit on appeals panels, including in cases involving removal from the register. This created a risk of conflicts of interest and blurred the separation between governance and adjudication. Where those responsible for the overall management of a register are involved in deciding complaints outcomes, this can undermine the perceived independence of decisions and reduce confidence for complainants, registrants and the public in the fairness of the process.
- **The roles of the register, complainants and registrants were not clear.** Some policy wording suggested that complainants or registrants might be expected to present or prosecute their own cases at hearings or appeals.

This creates a risk of unfairness. Complaints often reflect personal experiences that may not align directly with the breaches of standards or codes the register can act on, and it is for the register to identify and present these issues based on evidence.

There is also a risk that complainants may be expected to confront or question the other party in formal proceedings, which many will not be equipped to do. This may discourage people from pursuing legitimate concerns and undermine consistent decision-making.

- **The complaints framework lacked clarity and consistency.** Information about complaints handling was spread across several documents and was not always consistent. Thresholds for progressing complaints, arrangements for interim measures, and separation of decision-making roles were unclear or described differently across policies. This made it harder for complainants and registrants to understand what would happen, when decisions would be made, and who would be involved, increasing the risk of confusion, delay and loss of confidence in the process.

3.3 The IOT provided its response to the Conditions by the required date, with further updated evidence submitted in January and February 2026.

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## 4. Assessment of Condition One

- 4.1 This Condition required the IOT to ensure its appeals process for complaints outcomes is clear to all parties and sufficiently independent. This includes having lay involvement, excluding Board Directors from appeals decision-making, and ensuring appeal decision-makers have not previously been involved in the complaint.
- 4.2 The IOT reviewed and revised its Appeals and Restoration Policy. Our initial review identified that the policy still allowed Board Directors to sit on appeal panels (including in removal appeals), contained inconsistent descriptions of panel composition, and implied automatic reinstatement following a successful removal appeal.
- 4.3 The IOT addressed these issues through amendments in January 2026. The updated policy now:
- removes Board Director involvement in appeals panels,
  - sets out a standard appeals panel model (independent chair, lay member, registrant member),
  - confirms panel members must have had no prior involvement in the case, and
  - clarifies that a successful appeal does not prevent an alternative sanction being applied where needed for public protection.
- 4.4 The IOT also confirmed that appeals will be determined by newly appointed panels independent of the Board while it continues recruitment of additional panellists.
- 4.5 We noted that, while the revised policies confirm that appeals panel members must be independent of the Board and have had no prior involvement in the case, they do not fully explain how potential conflicts of interest will be identified and dealt with in practice during complaints proceedings.
- 4.6 We found this Condition was met. However, to strengthen transparency and confidence in how appeals are handled, we have made the following Recommendation:
- **Recommendation One:** The IOT is to ensure opportunities exist to declare or raise potential conflicts of interest during complaints proceedings.

## 5. Assessment of Condition Two

- 5.1 This Condition required the IOT to make clear that it is responsible for investigating and presenting complaints, with complainants and registrants participating as witnesses rather than being expected to present or prosecute their own cases.
- 5.2 The IOT reviewed its complaints and appeals documentation and confirmed that its intended approach is for complaints and appeals to be led by the register, including through the use of an Independent Case Presenter at hearings.
- 5.3 Our initial review identified wording within the Complaints Policy and Appeals and Restoration Policy that suggested complainants or registrants might be required to outline grounds of appeal, present evidence or otherwise advocate for their own case. This created a lack of clarity about who is responsible for presenting cases and did not meet the minimum requirements of Standard Five.
- 5.4 The IOT addressed this through amendments to its Complaints Policy, and Appeals and
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Restoration Policy, clarifying that responsibility for presenting cases rests with the register and that complainants and registrants participate as witnesses.

5.5 We noted that some wording within its process could be further tightened for consistency. However, the revised policies now clearly set out a register-led approach to investigating and prosecuting complaints.

5.6 We found this Condition was met, with the following Recommendation to improve clarity in practice:

- **Recommendation Two:** The IOT is to remove any remaining ambiguous or inconsistent wording about the presentation of cases at hearings and appeals.

## **6. Assessment of Condition Three**

6.1 This Condition required the IOT to review and update its complaints handling policies and procedures to ensure consistency across documents, clear thresholds for progressing complaints, appropriate separation of decision-making roles, and clarity around appeals, interim measures and other technical aspects of the process.

6.2 The IOT reviewed and updated its complaints framework, including its Complaints Policy, Fitness to Practise Hearings Policy and Sanctions Guidance.

6.3 The revised framework sets out a clearer structure for handling complaints, including a defined investigation stage and a threshold test for progressing cases to a Fitness to Practise hearing. It also confirms the use of an Independent Case Presenter and provides a structured sanctions framework, including arrangements for reviewing sanctions and monitoring compliance.

6.4 Our initial reviews identified inconsistencies across the complaints documentation, including unclear thresholds for escalation, inconsistent references to interim measures, and limited clarity about separation of roles between investigation and adjudication. The updated policies address these issues to a significant extent and improve consistency across the framework.

6.5 We noted that some aspects of the framework could be clearer, including making role separation explicit at all stages, improving cross-referencing between documents, and providing clearer information about accepting complaints outside the fixed 12-month time limit.

6.6 We found this Condition was met, with the following Recommendations to further improve clarity and consistency:

- **Recommendation Three:** The IOT is to make explicit that individuals involved at the investigation stage will not also sit on adjudication panels.
- **Recommendation Four:** The IOT is to improve cross-referencing between complaints, appeals and sanctions documents so the end-to-end process is easier to follow.
- **Recommendation Five:** The IOT is to provide clearer information about what constitutes “exceptional circumstances” for accepting complaints older than 12 months.
- **Recommendation Six:** The IOT is to ensure information about monitoring compliance with sanctions is clearly signposted within the Complaints Policy.

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## 7. Conclusion

- 7.1 We found that the Institute of Trichologists has met all three Conditions issued following the July 2025 review. The IOT reviewed and updated its complaints and appeals arrangements to address the issues identified under **Standard Five: Complaints and concerns about registrants**.
- 7.2 During the Condition review process, the IOT engaged with our assessment, responded to issues we raised, and made further amendments where needed. The resulting changes strengthen the independence, clarity and consistency of its complaints and appeals processes.
- 7.3 We therefore found that the Conditions have been met, subject to the new Recommendations for improvement set out in this report.