

Condition Review: Institute of Trichologists (IOT)

1. Outcome

- 1.1 After reviewing whether the Institute of Trichologists (IOT) had met the Conditions set following our **Targeted Review** (concluded in November 2025), the Professional Standards Authority (“we”) issued five further Conditions on its accreditation, to be completed by 5 March 2026 (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’)¹. 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 five 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 publish clear processes for all routes to registration.

Condition Two: The IOT must record and publish processes for recognising external regulatory decisions. These must be set out in registration policies and reflected in application materials, requiring applicants and registrants to declare relevant information.

Condition Three: The IOT must develop appropriate protocols for managing safeguarding concerns it is notified of or becomes aware of to ensure consistent and appropriate action is taken.

Condition Four: The IOT must develop and implement documented business continuity arrangements covering all critical regulatory functions. The IOT must have at least a provisional business continuity plan in place, alongside a plan for finalisation

¹ Standards for Accredited Registers, 2023 edition:

www.professionalstandards.org.uk/publications/standards-accredited-registers

through appropriate governance processes.

Condition Five: The IOT must develop and implement a documented organisational risk management framework, including an organisational risk register that is regularly reviewed by the Board. The IOT must have at least a provisional organisational risk register in place, alongside a plan for finalisation through appropriate governance processes.

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
- Share Your Experience submissions that were relevant to this assessment

3. Concerns leading to the Conditions

3.1 At the targeted review completed in November 2025, we identified concerns about the Institute of Trichologists' (IOT) arrangements for carrying out its role as a register. In particular, there were weaknesses in how routes to registration were explained, how safeguarding and external decisions were handled, and how the organisation planned for risk and disruption. These issues created a risk that decisions would not always be clear, consistent or well supported.

3.2 We found that:

- **Routes to registration were not sufficiently clear or transparent.**
The IOT's public-facing information did not clearly set out all routes to registration. While the primary education pathway was described, information for applicants seeking registration through alternative routes, including those trained elsewhere, internationally, or relying on prior learning and experience, was limited, difficult to locate, or incomplete. This reduced transparency for prospective applicants and did not sufficiently demonstrate how different routes were assessed in a consistent and fair way.
- **Processes for recognising external regulatory decisions were not clearly recorded or published.**
The IOT had not demonstrated a documented process for recognising decisions relating to professional conduct made by other regulators, employers or Accredited Registers. Application and renewal materials did not clearly require applicants or registrants to declare relevant external disciplinary history. This created a risk that individuals subject to relevant findings elsewhere could be admitted to, or remain on, the register without appropriate consideration.
- **Arrangements for managing safeguarding concerns were underdeveloped.**
While the IOT had a safeguarding policy that provided signposting for registrants, it did not have its own documented protocols for handling safeguarding concerns it was notified of or became aware of. This created a risk of inconsistent or delayed action on safeguarding matters and did not fully meet the requirement for Accredited Registers to have clear arrangements for escalating concerns to relevant external agencies where appropriate.

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- **Business continuity arrangements were not in place.**
The IOT did not have documented business continuity arrangements covering its critical registration functions. In the event of disruption, this could have affected the organisation's ability to continue core activities such as registration, complaints handling and public protection.
 - **There was no documented organisational risk management framework.**
The IOT did not have a formal organisational risk management framework or risk register in place. Without a structured approach to identifying, assessing and managing risks, and without clear Board oversight of those risks, there was a risk that emerging or material threats to the organisation's registration functions would not be identified or managed in a timely or effective way.

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

4. Assessment of Condition One

4.1 This Condition required the IOT to publish clear processes for all routes to registration.

4.2 We found that the IOT has now clearly set out its **routes to registration on its website** and has published a **Routes to Registration policy**. This explains who each route is intended for, what evidence applicants must provide, how applications are assessed, who is involved in decision-making, the possible outcomes, and how applicants can appeal decisions. The information is publicly accessible and supported by route-specific application pages and forms.

4.3 These changes address the lack of transparency identified at the targeted review and make it clearer to prospective applicants how to apply, including those trained outside the IOT or internationally.

4.4 However, we note that these arrangements are new and will need to work in practice for applicants and education providers. Making the benchmarks used to assess applications clearer would help people better understand what is required and how decisions are made.

4.5 We therefore found that **Condition One has been met** with the following Recommendation to help improve practice:

- **Recommendation R-IOT-CR-25/26-12:** The IOT should work with relevant stakeholders, including external education providers and lay representatives, to review and publish specific Education and Clinical Competence benchmarks and equivalence criteria, including learning outcomes, minimum evidence thresholds and examples, so that requirements are clear, fair and transparent across all routes.

5. Assessment of Condition Two

5.1 This Condition required the IOT to record and publish processes for recognising relevant decisions made by other regulators or professional bodies.

5.2 We found that the IOT has now published a policy explaining how it recognises external regulatory decisions. The policy requires applicants and registrants to declare relevant regulatory history and sets out the types of decisions that will be considered, including

sanctions, restrictions, refusals of registration and relevant overseas decisions. It also explains how this information is assessed and the possible outcomes.

5.3 These changes address the risk identified at the targeted review that relevant external regulatory information might not be identified or considered when making registration or fitness to practise decisions.

5.4 However, we note that the policy does not clearly explain how the IOT would manage situations where an external complaints or disciplinary process is still ongoing at the same time as its own consideration of registration, renewal or fitness to practise.

5.5 We therefore found that **Condition Two has been met** with the following Recommendation to help improve practice:

- **Recommendation R-IOT-CR-25/26-13:** The IOT should set out how it will manage cases where complaints or disciplinary processes being undertaken by another body are ongoing at the same time as its own regulatory processes.

6. Assessment of Condition Three

6.1 This Condition required the IOT to develop appropriate protocols for managing safeguarding concerns it is notified of or becomes aware of.

6.2 We found that the IOT has now developed a documented safeguarding protocol. This sets out how safeguarding concerns are received, who is responsible for managing them, how concerns are assessed, and when matters should be referred to external agencies such as the police or local authority safeguarding teams. The protocol also explains how safeguarding concerns link to registration and fitness to practise processes.

6.3 These arrangements address the gap identified at the targeted review and provide a clearer and more consistent framework for responding to safeguarding concerns, supporting appropriate and timely action where risks are identified.

6.4 We therefore found that **Condition Three has been met**.

7. Assessment of Condition Four

7.1 This Condition required the IOT to develop and implement documented business continuity arrangements covering its critical registration functions.

7.2 We found that the IOT has now put in place a documented business continuity plan. The plan identifies the IOT's key activities as a register, such as registration and complaints handling, and sets out who is responsible for maintaining these functions if the organisation experiences disruption. It also explains how the IOT would respond to events that could prevent it from operating as normal.

7.3 These arrangements address the concern identified at the targeted review that the IOT did not have clear plans in place to continue its work if it faced unexpected disruption. Having these arrangements helps ensure that important activities, such as registering practitioners and handling concerns, can continue even if the organisation is affected by unforeseen events.

7.4 However, we note that the business continuity plan is described as provisional and has

not yet been tested in practice. Regular review and testing would help the IOT confirm that the arrangements are workable and remain appropriate over time.

7.5 We therefore found that **Condition Four has been met** with the following Recommendation to help improve practice:

- **Recommendation R-IOT-CR-25/26-14:** The IOT should continue to develop its business continuity arrangements, review them regularly and test them periodically so it can be confident the plan will operate effectively if required.

8. Assessment of Condition Five

8.1 This Condition required the IOT to develop and implement a documented organisational risk management framework, including a risk register that is regularly reviewed by the Board.

8.2 We found that the IOT has now developed a documented approach to identifying and managing risks to the organisation and its ability to operate the register effectively. This includes a risk register and supporting framework that describe the main risks the IOT faces, who is responsible for managing them, and what steps are in place to reduce or control those risks.

8.3 These arrangements address the concern identified at the targeted review that the IOT did not have a structured way to identify and oversee risks that could affect its ability to operate its register effectively. Regular review of risks by the Board supports better oversight and helps ensure that emerging issues are identified and addressed in a timely way

8.4 We therefore found that **Condition Five has been met**.

9. Conclusion

9.1 We found that the Institute of Trichologists has met all five Conditions issued following the targeted review in November 2025.

9.2 During the Condition review process, the IOT engaged constructively with our assessment, provided evidence within the required timeframes, and responded to issues raised. The resulting changes support clearer processes for applicants and registrants and strengthen arrangements intended to protect the public.

9.3 We have made a small number of Recommendations to support further improvement and to help ensure that the new arrangements continue to operate effectively as they are embedded in practice.

9.4 We therefore conclude that the Conditions have been met, subject to the Recommendations set out in this report.