Accredited Registers

Condition Review: Institute of Trichologists (IOT)

4 July 2025

Outcome

1.1   When granting accreditation to the Institute of Trichologists' (IOT) register, we initially issued eight Conditions of Accreditation. Two of these Conditions required completion by March 13, 2023, with the remaining Conditions to be fulfilled by the IOT's next scheduled assessment. The full list of Conditions and the reasons for setting them were published in the IOT's original accreditation decision[1].

1.2   This report evaluates the IOT's progress in meeting these Conditions. Our assessment found that the IOT has successfully fulfilled Conditions 1-6. However, Conditions 7 and 8 were unmet. In response, we have set three Conditions and five new Recommendations. They are:

Conditions		Deadline
Standard 5	**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.	Five months
Standard 5	**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.	Five months
Standard 5	**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 progressing complaints from investigation to adjudication.	Five months

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[1] [Institute of Trichologist (IOT) Initial Accreditation Report](#)

Recommendations		Deadline
Standard 8	**Recommendation One:** The IOT should continue developing additional methods to gather and incorporate feedback from service users and stakeholders to further enhance their services.	Next assessment
Standard 6	**Recommendation Two:** The IOT should improve its organisational complaints procedures by providing links to its policy and contact forms.	Next assessment
Standard 5	**Recommendation Three:** The IOT should consider implementing an initial screening process to ensure that appeal applications meet required grounds before they are referred to an Appeals Panel.	Next assessment
Standard 5	**Recommendation Four:** The IOT should either publish guidance documents referred to in its public-facing policies or include key information from them.	Next assessment
Standard 5	**Recommendation Five:** The IOT should review its 12-month time limit for complaints to ensure fair access to the complaints process.	Next assessment

Background

2.1 We assess registers against our *Standards for Accredited Registers* ('the Standards')[2]. 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. Information on how Conditions are assessed can be found in our *Renewals, Targeted Reviews and Outcomes* guidance[3].

The Conditions were:

1. The IOT must review the information it provides on its website for the public about the evidence that is available about trichology. The IOT should be clear about the limitations of the evidence currently available.

2. The IOT should ensure that all members of its Board and Committees are equipped to make fair, consistent, and transparent decisions. The

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[2] The IOT was initially accredited under the 2016 Standards for Accredited Registers. As the *Standards for Accredited Registers* (2021) now apply to all registers, this assessment reviewed compliance with both frameworks.
[3] Guidance for Accredited Registers – Renewals, Targeted Reviews and Outcomes

IOT should consider mechanisms such as appraisals for monitoring the ongoing competence of its Board and committee members and consider induction training and ongoing training in areas such as equality and diversity, data handling and decision making in disciplinary procedures for key decision makers.

3. The IOT should explore options for informing and involving the public and service users in what they do and provide an update of progress at the next review of accreditation.

4. The IOT should review and update its Code of Professional Practice and Ethics to ensure greater clarity over its requirements for its registrants. They should be clear what is a requirement and therefore something that a registrant is held to account to and what is guidance.

5. The IOT should review how it communicates its CPD requirements on its register and ensure that it has appropriate mechanisms in place to check that its registrants are complying with the requirement.

6. The IOT should develop and publish its organisational complaints policy.

7. The IOT should review its appeals process for complaints outcomes to ensure that it is clear to all parties what the process is. Decision makers must not have previously been involved in the complaint. The IOT should review and update its procedures to ensure there is appropriate separation for appeals.

8. The IOT should:
   a) review and update its Complaints handling policies and procedures to ensure consistency between the different documents.
   b) develop its processes to ensure that they are clear about appeals, interim orders and other technical aspects as highlighted by the Accreditation Team.

2.2 The IOT submitted evidence within the required timeframes for all Conditions. We reviewed this evidence alongside information published on the IOT's website: https://trichologists.org.uk/

Condition One

3.1 The IOT's application for accreditation was assessed against the requirements of the 2016 Standards for Accredited Registers, however the newer Standard One from the 2021 Standards, including the "public interest test"[4], was included within that assessment.

3.2 Standard One ensures registers operate within the scope of voluntary regulation and that registrants' activities benefit the public, with appropriate risk management to maintain public protection and trust.

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[4] Guidance for Accredited Registers – Supplementary Guidance – Standard One

3.3   Our initial assessment found limited evidence about the benefits and risks of trichology. While the potential benefits appeared to outweigh potential risks, we found the IOT's website did not effectively communicate the available evidence base to the public.

3.4   In response, the IOT has created a dedicated research section on its website with links to reputable academic sources. This page presents summaries of both external research and research by IOT registrants in an accessible format. The IOT has also commissioned a patient survey to gather data on perceptions of trichology, aiming to address evidence gaps. This survey will involve up to 300 patients and is due to complete in August 2025.

3.5   The IOT has addressed this Condition by providing information about trichology research on its website. Our assessment found no instances of the IOT or its registrants making unproven claims or misleading the public.

3.6   This Condition has been met. We will monitor the survey's progress and review its outcomes when available.

Condition Two

4.1   Our initial assessment identified concerns about the IOT's governance arrangements, particularly how it separated its regulatory functions from its professional membership role. We required clear boundaries between these activities, independent funding for register operations, governance groups free from financial influences, removal of Board involvement in registration and complaints decisions, and inclusion of lay members in governance.

4.2   While the IOT implemented these changes, we set a further Condition to ensure continued improvement in its governance processes.

4.3   The IOT has reinforced its governance by:

- Implementing Board and Registrar training in data protection, equality and diversity, and decision-making

- Providing induction processes with shadowing and mentorship for new Board and committee members

- Setting minimum annual training requirements and providing CPD access

4.4   We concluded that this Condition has been met. However, we remained concerned that Board involvement in complaints decisions could create conflicts of interest and undermine confidence in the complaints process. We address this further in our assessment of Conditions Seven and Eight.

Condition Three

5.1   We considered that the IOT needed to develop and actively seek opportunities for engagement with patients, the public and other stakeholders. This is a core requirement under the 2021 Standards, as set out in the [Accredited Registers Evidence Framework](#)..

5.2   The IOT has launched a 12-month patient survey, as mentioned under Condition One. This survey aims to measure treatment benefits and identify areas for improvement. The IOT also engages with the public through its website and social media channels.

5.3   We found that the IOT's survey programme demonstrated sufficient progress to meet this Condition. However, as the survey is a single project due to end in August 2025, we issued a Recommendation for the IOT to continue to seek engagement opportunities:

5.4   **Recommendation One:** The IOT should continue developing additional methods to gather and incorporate feedback from service users and stakeholders to further enhance their services.

Condition Four

6.1   During initial assessment, we required the IOT to update its Code of Professional Practice and Ethics. The Code needed specific standards for registrants about indemnity cover, the professional duty of candour, safeguarding, and managing conflicts of interest. While most issues had been addressed, we considered that the Code did not clearly set out the standards registrants must meet.

6.2   The IOT published its revised Code in November 2024. The Code is now structured around nine core principles and uses mandatory directives instead of advisory language. It sets explicit requirements for informed consent, includes clear standards for professional conduct, and features streamlined content throughout. These changes will help the IOT identify potential breaches of conduct more effectively when considering if disciplinary action is needed.

6.3   We found that this Condition was met.

Condition Five

7.1   During our initial assessment, we found that the IOT needed to make its Continuing Professional Development (CPD) requirements explicit.

7.2   The IOT has now clearly set out its CPD requirements in its Code. Registrants must gain at least 10 CPD points each year and submit these for approval. While the IOT provides some CPD opportunities, registrants can obtain points from other recognised providers. The IOT website now clearly explains these requirements, what happens if they are not met, and how to appeal decisions.

7.3   We found that this Condition was met.

Condition Six

8.1   We required the IOT to publish its policies and procedures so that people may raise concerns or complaints about the Accredited Register.

8.2   The IOT has now published its Organisational Complaints Policy. This covers concerns about service delivery, complaint handling, and responses to Freedom of Information or Data Protection requests. The IOT's Head of Governance manages this process, with escalation to the Chair if needed. The IOT commits to acknowledging complaints within five days and aims to resolve them within 20 days, offering remedies such as apologies or reconsidering the issue raised.

8.3   We found that this Condition had been met as the IOT had published its policy. However, to better enable people to raise concerns, we suggested the policy should be accessible directly from its Concerns webpage and include links to its contact forms. As a result, we issued:

8.4   **Recommendation Two:** The IOT should improve its organisational complaints procedures by providing links to its policy and contact forms from the complaints webpage.

Condition Seven

9.1   When first assessing the IOT's application, we identified issues with its complaints handling processes, particularly appeals procedures that affected its ability to meet the Standards. Issues included a lack of clarity about decision-makers' roles and responsibilities and that the limited size of the Registration Council meant the same individuals could be involved at multiple stages of a complaint - from initial investigation through to the appeal hearing. This compromised the independence and fairness of the appeals process.

9.2   The IOT has developed and implemented two new policies: one for appeals against complaints outcomes and another for registration decision appeals. While these policies have improved the process by setting out documentation requirements, timeframes and procedures, several important concerns remained:

- The Registration Council was too few in number to provide enough members who had not been involved in earlier stages of complaints if a complaint moves through all stages.

- Having Board Directors sit in removal appeals risked conflicts of interest and could eliminate lay input

- Without initial screening for appropriate grounds for appeal, unnecessary proceedings could occur

- Requiring complainants and registrants to present their own cases at hearings, rather than appearing as witnesses while the IOT presents the case, could disadvantage individuals and lead to unfair outcomes

9.3   The IOT has outlined plans to expand its Registration Council and recruit more lay and professional panel members to increase independence and capacity.

9.4   We found this Condition had not been met. While the IOT has made progress in clarifying its appeals processes, the identified risks meant further action was needed to meet Standard 5. We therefore issued two new Conditions and one Recommendation:

9.5   **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.

9.6   **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.

9.7   **Recommendation Three:** The IOT should consider implementing an initial screening process to ensure that appeal applications meet required grounds before they are referred to an Appeals Panel.

Condition Eight

10.1   Beyond our concerns about appeals procedures in the initial application, we identified broader issues with the IOT's complaints handling framework. The IOT needed to ensure consistency across its complaints documents and develop clearer processes for key aspects like interim orders, investigation thresholds, and decision-making independence.

10.2   The IOT has reviewed and updated its policies, publishing documents covering complaints procedures, sanctions, and hearings. While noting overall improvements, including clear support provisions for parties at hearings, we noted several important issues needed to be addressed to meet our minimum requirements for complaints handling:

- The Complaints Policy referenced guidance documents that were not publicly available

- Investigation timeframes were not specified, creating uncertainty for all parties

- The new appeals policy was not referenced within the Complaints Policy

- Information about interim orders was inconsistent across different documents

- The same individuals could be involved in both investigating and adjudicating complaints

- There was no clear test (such as "case to answer") for progressing complaints from investigation to hearing

- The policy limiting complaints to events within the last 12 months could unfairly restrict access to the complaints process

- The process for handling non-compliance with sanctions needed to be addressed

10.3 The IOT outlined plans to address these issues, particularly by increasing its pool of lay and professional panel members. However, we found that this Condition had not been met. While the IOT has improved its complaints procedures, further work is needed to meet Standard 5. To ensure that the concerns listed above are addressed we re-issued Condition 8, and issued two new Recommendations:

10.4 **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 progressing complaints from investigation to adjudication.

10.5 **Recommendation Four:** The IOT should either publish guidance documents referred to in its public-facing policies or include key information from them.

10.6 **Recommendation Five:** The IOT should review its 12-month time limit for complaints to ensure fair access to the complaints process.

Conclusion

11.1 The IOT has successfully met six of its eight Conditions, demonstrating substantial progress. However, two Conditions relating to complaints handling remained unmet.

11.2 Following our process, we considered whether Suspension or Withdrawal of Accreditation was necessary. Considering the IOT's overall progress and engagement, its current procedures, and the low volume of complaints it manages, we determined that a proportionate response was to:

- Reissue modified versions of Conditions Seven and Eight

- Issue one new Condition

- Issue five Recommendations

11.3 This approach will support the IOT in achieving full compliance with our Standards while maintaining public protection.