

Targeted Review:

Institute of Trichologists (IOT)

1. Outcome

- 1.1 The Accreditation Panel considered the evidence from the targeted review of the Institute of Trichologists (IOT) (<https://trichologists.org.uk>) focusing on Standards Two, Three, Five, Six and Seven.
- 1.2 The table below summarises the outcomes reached by an Accreditation Panel against each Standard under consideration:

Standard	Outcome
Two	Met with two conditions Condition One: The IOT must publish clear processes for all routes to registration. This is to be completed within three months. 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. This is to be completed within three months.
Three	Met
Five	Met with a condition 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. This is to be completed within three months.
Six	Met with two conditions 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

through appropriate governance processes. **This provisional stage is to be completed within three months.**

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. **This provisional stage is to be completed within three months.**

Seven	Met with a recommendation
	Recommendation One: The IOT should implement processes to ensure its risk matrix can be updated between formal review cycles to capture and address emerging risks in a timely manner. This could include establishing triggers for risk matrix updates (such as significant complaints, media coverage, or regulatory changes), assigning responsibility for ongoing risk monitoring, and creating a streamlined process for Board consideration of new or escalated risks outside of the formal three-yearly review cycle.

2. Background

- 2.1 We carry out an annual check of each Accredited Register to monitor whether Standards for Accredited Registers ('the Standards')¹ continue to be met. Where we require more information, or have concerns, we may escalate this to a targeted review².
- 2.2 The IOT was subject to a targeted review to consider Standards Two, Three, Five, Six and Seven. In reaching its decision, the Panel reviewed the information provided by the IOT during the annual check, the additional material submitted in response to the targeted review, checks of the IOT's website and published documents, and other relevant information considered necessary to assess whether the Standards were met.

3. Assessment against the Standards

Standard Two – Management of the register

- 3.1 The Panel found this Standard was **met with Conditions**. The minimum requirements

¹ Standards for Accredited Registers, 2023 edition:

<https://www.professionalstandards.org.uk/publications/standards-accredited-registers>

² Guidance on renewing accreditation: <https://www.professionalstandards.org.uk/organisations-we-oversee/our-work-accredited-registers/renewing-your-accreditation>

set out in our Evidence Framework³ state that registers must have “*clear, published processes for all routes to registration*”. The Panel found that the IOT’s public website did not set out application routes to registration clearly, and some application pages were difficult to locate or incomplete. Similarly, we require a “*process for recognising decisions regarding professional conduct made by regulatory bodies and other Accredited Registers*”. The IOT had not demonstrated recorded processes for recognising external regulatory decisions, and its application and renewal processes did not require applicants or registrants to declare such information. Without these safeguards, there is a risk that individuals with relevant disciplinary findings could be admitted to, or remain on, the register.

- 3.2 **Conditions One and Two** were issued to ensure the IOT publishes clear, accessible processes for registration and establishes procedures for recognising external regulatory decisions.

Standard Three – Standards for registrants

- 3.3 The Panel found this Standard was **met**. Standard Three requires a “*process for handling safeguarding concerns with appropriate signposting*”. The review was triggered by the need for assurance on safeguarding arrangements. The IOT has a safeguarding policy in place for the benefit of registrants, which provides appropriate signposting. However, the Panel noted that wider safeguarding protocols for the IOT itself sit more properly under Standard Five, which covers complaints and concerns. The Panel therefore concluded that Standard Three was met.

Standard Five – Complaints against registrants

- 3.4 The Panel found this Standard was **met with a Condition**. Standard Five requires processes to ensure disciplinary outcomes are shared with other Accredited Registers, and the IOT has met this requirement by joining the Accredited Registers Information Sharing Protocol⁴. By joining the Protocol, the IOT has committed to issue and respond to alerts within agreed timeframes, and to take account of information shared by other registers when making its own registration decisions. This strengthens public protection by reducing the risk that an individual removed from one Accredited Register could continue practising undetected via another.
- 3.5 However, the Panel identified a separate public protection risk in relation to safeguarding. While the IOT’s safeguarding policy provides signposting for registrants, the organisation does not have its own protocols for handling concerns it is notified of or becomes aware of. The Panel considered that this gap creates a risk of inconsistent or delayed action on safeguarding matters. To address this, the Panel issued a Condition for the IOT to meet our requirement for Accredited Registers to have “*a policy*”

³ Standards for Accredited Registers: Evidence Framework

<https://www.professionalstandards.org.uk/publications/standards-accredited-registers>

⁴ Information about the protocol is available at: <https://www.ahcs.ac.uk/about-us/who-we-work-with/>

for reporting concerns to other relevant agencies (such as the Police or Social Services).”

- 3.6 **Condition Three** requires the IOT to develop safeguarding protocols within three months.

Standard Six – Governance

- 3.7 The Panel found this Standard was **met with two Conditions**. Standard Six requires “*business continuity arrangements, and a documented approach to organisational risk management with Board oversight*”. The Panel noted that the IOT had no formal continuity plan or organisational risk register, leaving the organisation exposed if it experienced disruption. To safeguard its regulatory functions, the Panel required the IOT to develop and implement both documented business continuity arrangements and an organisational risk management framework. These must be developed to at least a provisional standard within three months, with a clear plan in place for finalisation through appropriate governance processes.
- 3.8 **Conditions Four and Five** were issued to strengthen the IOT’s ability to continue operating effectively during disruption and to manage organisational risks proactively, providing assurance that it can reliably fulfil its registration functions.

Standard Seven – Management of risks arising from the activities of registrants

- 3.9 The Panel found this Standard was **met**. Standard Seven requires “*a risk register or matrix covering risks arising from registrants’ activities, discussed by leadership on a periodic basis*”. The IOT maintains a practitioner risk matrix that records relevant risks and mitigating actions in place. However, the matrix is formally reviewed only every three years, which may not be frequent enough to capture emerging risks. Without more dynamic updates, there is a risk that new threats could go unaddressed, affecting patient safety.
- 3.10 **Recommendation One** was issued to encourage the IOT to establish mechanisms for updating its risk matrix between review cycles, giving the public greater assurance that emerging risks will be identified and addressed promptly.

4. Impact Assessment

- 4.1 The Panel considered whether the targeted review raised any new equality, diversity, inclusion, or other impact considerations. No relevant changes were identified.

5. Next steps

- 5.1 The IOT must meet the Conditions by the specified deadlines.
- 5.2 We will consider how the IOT has taken forward the Recommendation at its next assessment.