

Accredited Registers

Condition Review: Human Givens Institute (HGI)

1. Outcome

At the Human Givens Institute (HGI)'s accreditation renewal, the Professional Standards Authority ('we') issued five Conditions on its accreditation, three of which were to be completed by 9 February 2024 and two by 9 May 2024 (see summary section of the published outcome).

This report sets out our assessment of the actions taken by the HGI to satisfy the Conditions.

We found that the HGI had met Conditions: 2, 3, and 5 and met Conditions 1 and 4 with recommendations.

2. Background

We assess registers against our *Standards for Accredited Registers* ('the Standards')¹. Where a Register has not met the minimum requirement of a Standard, we can issue Conditions. A Condition sets out the requirements and the timeframe that a Register must meet.

At HGI's accreditation renewal, completed in November 2023, we issued five Conditions (a full list is published on the HGI's directory page <u>Human Givens</u> <u>Institute - Accredited Registers | PSA (professionalstandards.org.uk)</u>). Conditions 2, 3, and 4 had to be implemented by 9 February 2024, while Conditions 1 and 5 had to be completed by 9 May 2024:

1. The HGI must ensure that the scope and limitations of Human Givens treatment are clearly communicated to both registrants and the public, particularly regarding situations where a referral to another healthcare professional is appropriate.

2. The HGI must set explicit requirements that its registrants must not offer or provide Conversion Therapies.

3. The HGI's Ethics and Conduct Policy should publish all codes relating to the competence and conduct of its registrants, and this should include reference to the Duty of Candour.

¹ The HGI were assessed against the new standards <u>Standards for Accredited Registers</u> <u>2023.pdf</u>

4. The HGI must provide a plan for developing mechanisms to provide independent assurance of the qualifications it accepts for entry to the register. This must include timescales for implementation.

5. The HGI must develop a policy for reporting relevant complaints outcomes to appropriate bodies, including the Accredited Registers.

This report discusses the actions HGI took to address the Conditions, as well as our decision about whether the Conditions are met.

We reviewed the following evidence:

- a) HGI's reported actions about what it had done to meet Conditions 1, 2, 3, 4, and 5.
- b) fitnesss to practise-registered-members-declaration form (05-24) (B).pdf
- c) <u>fitnesss to practise-trainee-members-declaration form(05-24) (Digital)</u> (B).pdf
- d) HGI Website: <u>Human Givens Institute: Holistic & Scientific Approach To</u> Your Needs (hgi.org.uk)

3. Concerns leading to the Conditions

3.1.1 Condition One

At our last full assessment, we considered that the HGI's materials generally outline the benefits of treatments for various conditions, including emotional and mental health issues. We noted claims to help relieve medical conditions such as 'psoriasis, eczema, asthma, irritable bowel syndrome, chronic pain and migraine'. Although this was in reference to the emotional components of such conditions, there was limited information about the scope and limitations of registrants' practice. While the HGI's Standards of Competence require working within the bounds of experience and training, we found that the HGI should offer more explicit standards or guidance detailing the treatment limitations and circumstances under which referral to medical care or other professionals is appropriate. This would address a potential risk that such statements may dissuade people from seeking necessary medical treatment.

3.1.2 Condition Two

During our last full renewal assessment, we could not find explicit mitigation against the risk of registrants practising conversion therapy. Conversion therapy is the term for the practice that assumes certain sexual orientations or gender identities are inferior to others and seeks to change or suppress them on that basis. The PSA will not accredit any register that permits conversion therapy. We noted that although the HGI confirmed to us that its approach was aligned with the Memorandum of Understanding on conversion therapy in the UK², this was not made clear in its published requirements.

3.1.3 Condition 3:

The Ethics and Conduct Policy referred to a fourth section 'D' that was not publicly accessible. We considered that all sections of the HGI's codes relevant to registrants should be publicly available. If the fourth section does not contain requirements for registrants, it should be excluded from the Codes.

Although HGI's Codes require registrants to inform their clients of HGI's complaints procedures, we did not see clear reference to the Duty of Candour – to be open and honest when things go wrong. While Accredited Registers are not subject to the statutory Duty of Candour, it is a part of our minimum requirements to promote openness and honesty, accountability, improvement, and learning.

3.1.4 Condition 4

The HGI College's diploma is currently accredited by a CPD body. The HGI told us the College is seeking university accreditation equivalent to a Regulated Qualifications Framework (RQF) Level 7 course. We were concerned about whether the current accreditation gave sufficient independent assurance about how the qualifications delivered the levels of competence necessary for independent practice within counselling and psychotherapy. We also noted that the term 'Post Graduate Practitioner's Assessment' used by the HGI College could misleadingly imply current RQF Level 7 qualification. We noted that the HGI has plans for further accreditation of its courses, but thought it is important that these are expedited.

3.1.5 Condition 5

At our last assessment, we found that the HGI did not have defined processes for informing other Accredited Registers, or other relevant bodies such as the police or social services, of complaints outcomes where it is in the public interest to do so. We noted that the HGI was not a signatory to the Accredited Registers Information Sharing Protocol, through which the registers 'share information so as to support Mutual Recognition of outcomes of disciplinary proceedings that lead to removal from an AR'.

3.2 Further details can be found under Standards One, Three, Four, and Five of the HGI's accreditation renewal outcome³.

4. Assessment of Conditions 1, 2, 3, 4, and 5

The HGI provided its response to the Conditions at various times in April and May 2024.

² Memorandum of understanding on conversion therapy in the UK (bacp.co.uk)

³ 231109-hgi-std-1-and-full-renewal-outcome.pdf (professionalstandards.org.uk)

We carried out an amalgamated review of the two sets of Conditions (with different timelines) that should have been assessed separately: three conditions (2, 3 and 4) were due in three months (by 9th February 2024), while the other two conditions (1 and 5) were due in six months (by 9th May 2024). The decision to combine the reviews was due first, to pragmatic reasons arising from the reorganisation and reassignment of work within our Accreditation Team. The second reason was the submission of evidence by the Register at different times. The latter resulted from a process of constructive, even if protracted, engagement between HGI and the Accreditation Team. For this reason, the evidence review process was often two or multi-staged. During the review process, there was occasional reference to initial considerations to reflect the first phase of the process, which were later updated as new evidence was received. This is reflected in the different dates recorded (in the assessment report) for receipt of evidence even for the same Condition.

Condition 1

Through its revision of relevant sections of its website, and by agreeing to refer clients to other medical professionals as appropriate, HGI has communicated to its registrants and the public that there are limitations to its treatments (<u>Standards of Competence</u>). This position is further reinforced by the inclusion of this need to "refer on" as a declaration in the Fitness to Practise form to be signed by all HGI registrants (<u>fitnesss to practise-registered-members-declaration form (05-24) (B).pdf</u>) and trainee registrants (<u>fitnesss to practise-trainee-members-declaration form(05-24)</u> (Digital) (B).pdf).

We recommend, however, that this HGI public communication would be further strengthened through an unambiguous statement on how they make sure that their registrants do not treat conditions that are outside of their competence if published at page <u>What to expect from human givens therapy | The Human Givens Approach</u> of their website.

Condition 2

HGI have now also made their opposition to conversion therapy both explicit and public. Conversion therapy is the term for therapy that assumes certain sexual orientations or gender identities are inferior to others and seeks to change or suppress them on that basis. This is not permitted under HGI's Register and its clearly so stated on their website (<u>https://www.hgi.org.uk/about-hgi/ethics-and-conduct/hgi-ethics-conduct-policy/section</u>).

Condition 3

The HGI has corrected the error in its Codes which suggested information was being withheld (<u>Ethics and Conduct Policy | www.hgi.org.uk</u>). The HGI has also developed its Duty of Candour policy following approval by its Board, and we were able to confirm that it has now been published on their website (<u>Duty of Candour</u>).

Condition 4

The HGI has provided information that its plan is to have its Diploma accredited by the University of Worcester, and that this process is underway. The HGI has noted that it will keep the PSA informed as the application goes through each stage of the process. While the timeframes provided are only an estimate, it appears that if they are correct, the accreditation approval will be in place for the HG Diploma beginning in September 2025.

However, the HGI should continue to provide updates to the Accreditation Team on progress as the course goes through the different stages of accreditation as the HGI has noted it will do. The HGI should also inform the team of any changes to the estimated timeframe.

Condition 5

Paragraph 48 of HGI's Indicative Sanctions Guidance policy clearly provides for HGI to communicate relevant complaints outcomes to other Accredited Registers and other bodies as appropriate: (<u>https://www.hgi.org.uk/sites/default/files/hgi/Indicative_Sanctions_Guidance.pdf</u>)

5. Conclusion

We therefore found that Conditions 1, 2, 3, 4 and 5 have been met.

However, Condition 1 is met with a recommendation for the text on the 'What to expect from human givens therapy' page (<u>What to expect from human givens</u> therapy | <u>The Human Givens Approach</u>) to match that provided on the 'How a human givens therapist can help page (<u>How a human givens therapist can help</u> <u>www.hgi.org.uk</u>). While these are different website pages, it is important for the information provided to be consistent.

Condition 4 is also met with the recommendation that the HGI should continue to provide updates to the Accreditation Team on progress as the course goes through the different stages of accreditation as the HGI has noted it will do. The HGI should also inform the team of any changes to the estimated timeframe.