# Accreditation renewal report

Standards 1-8

International Federation of Aromatherapists

October 2024



## Contents

About accreditation	3
The Outcome	4
About the Register	5
Assessment against the Standards	
Share your experience.	16
Impact assessment (including Equalities impact)	16

### About accreditation

The Professional Standards Authority (the PSA) accredits registers of people working in a variety of health and social care occupations that are not regulated by law. To become an Accredited Register, organisations holding registers of unregulated health and social care roles must prove that they meet our *Standards for Accredited Registers* (the Standards).

Initial accreditation decisions are made by an Accreditation Panel following an assessment of the organisation against the Standards by the Accreditation team. The Panel decides whether to accredit an organisation or not. The Panel can also decide to accredit with Conditions and provide Recommendations to the organisation. Once accredited, the Accreditation Team performs a full renewal assessment every three years. The Panel decides whether to accredit/ continue accreditation or not.

- Condition Issued when a Panel has determined that a Standard has not been met. A Condition sets out the requirements needed for the Accredited Register to meet the Standards, within a set timeframe. It may also reduce the period of accreditation subject to a review or the Condition being met.
- Recommendation Actions that would improve practice and benefit the operation of the Register, but which is not a current requirement for accreditation to be maintained.

This assessment was carried out against our Standards for Accredited Registers<sup>1</sup> ("the Standards") and our minimum requirements for the Standards as set out in our Evidence framework<sup>2</sup>. More about how we assess against Standard One can be found in our Supplementary Guidance for Standard One<sup>3</sup>.

We used the following in our assessment of the IFA:

- Documentary review of evidence of benefits and risk supplied by the IFA and gathered through desk research
- Documentary review of evidence supplied by the IFA and gathered from public sources such as its website
- Due diligence checks (including review of registrant's websites).
- Share your experience responses
- Site visits including discussions with members of staff
- Assessment of the IFA's complaints procedures.

<u>accredited-registers/accredited-registers-supplementary-guidance-for-standard-one.pdf?sfvrsn=3e5f4920\_6</u>

<sup>&</sup>lt;sup>1</sup> <u>https://www.professionalstandards.org.uk/docs/default-source/publications/standards/standards-for-accredited-registers.pdf?sfvrsn=e2577e20\_8</u>

https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-evidence-framework-for-standards.pdf?sfvrsn=55f4920\_9
 https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-

## The Outcome

The Accreditation Panel met on 29 May 2024 to consider the International Federation of Aromatherapists (IFA). The Panel was satisfied that the IFA met all the Standards for Accredited Registers.

#### We therefore decided to accredit the IFA.

We noted the following positive findings:

- The IFA have demonstrated a high level of commitment to understanding its client base.
- The IFA have well developed governance documentation which is evidenced by their successful re-accreditation at renewal.

## About the Register

This section provides an overview of the IFA and its register.

Name of Organisation	International Federation of Aromatherapists (IFA)	
Website	https://ifaroma.org/en_GB/home	
Type of Organisation	Register of complementary therapists practising aromatherapy – application of essential oils via massage	
Role(s) covered	The IFA holds a voluntary register of aromatherapists made up of the following members:	
	<ul> <li>Full Members – Are clinical aromatherapists trained to a level 5 standard (completed 680 hours of training) and offer massage.</li> <li>PEOT Members – Are clinical essential oil therapists trained to a level 5-6 standard (completed 725 hours of training) but do not offer massage.</li> <li>Associate members – Are aromatherapists that have met the national occupational standards and trained to a level 3-4 standard and offer massage.</li> </ul>	
Number of registrants	23 (as of 1 January 2024)	
Overview of Governance	Charity No 1165766 Companies House No 09732439 - Private Limited Company by guarantee without share capital use of 'Limited' exemption.  Charity overview, THE INTERNATIONAL FEDERATION OF AROMATHERAPISTS - 1165766, Register of Charities - The Charity Commission	
Overview of the aims of the register	The IFA is the first and largest professional body for aromatherapy. We introduced aromatherapy into the healthcare sector NHS hospitals hospices, clinic etc. We regulate and accredit standards in aromatherapy and are involved with improving academic standards in the practice of aromatherapy for the benefit of the public.	

#### Inherent risks of the practice

This section uses the criteria developed as part of the Authority's Right Touch Assurance tool<sup>4</sup> to give an overview of the work of Aromatherapists.

Diele evitorie Anometherenists	
Risk criteria	Aromatherapists
1. Scale of risk associated with Aromatherapists.	a. When you visit an IFA aromatherapist, there are several things you can expect.
a. What do Aromatherapists do?	1) Consultation: Before a treatment takes place, the aromatherapist will conduct a thorough consultation to establish
b. How many Aromatherapists are there?	the client's medical history and any pre-existing conditions that the client may have to ensure a safe and effective treatment.  2) Essential Oil Selection: Essential oils are then selected for that
c. Where do Aromatherapists work?	individual person based on their current health needs (both physical and emotional) and considering any safety issues that may arise.
d. Size of actual/potential service user	3) Bespoke Blend: The synergy of the blend of oils is also important, as oils must complement each other chemically for them to enhance the therapeutic effect.
group	Usually, a full body massage is carried out covering the legs, back/neck, abdomen, arms, face and scalp. Two different blends are used, one for the face and one for the body. A classic full body aromatherapy massage routine begins with the back, arms, shoulders, and neck, followed by the backs of the legs and the feet.
	b. There are an estimated 25,000 aromatherapists working in the UK <sup>5</sup> .
	<ul> <li>c. Registrants' currently practice in the NHS - for example some members work in oncology departments/ midwives/ ICU/ GP surgeries, the voluntary sector, for example, hospices, hospitals - maternity wards/ special care units, residential care homes, autism support groups etc, as well as schools.</li> </ul>
	d. People seeking aromatherapy-based massage treatments, including (as above) those seeking to complement medical care, for example related to 'cancer care, midwifery a disability or impairment'. Approx 10 clients on average.

<sup>&</sup>lt;sup>4</sup> https://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/right-touchassurance---a-methodology-for-assessing-and-assuring-occupational-risk-ofharm91c118f761926971a151ff000072e7a6.pdf?sfvrsn=f537120\_14.

https://www.theguardian.com/money/2009/oct/31/aromatherapy-career1

Means of assurance	The means of assurance will depend on the practise setting.  Those working within the NHS are likely to be included within clinical governance systems. Those working for other employers will be subject to employer checks which may include criminal records.
3. About the sector in which Aromatherapists operate	IFA registrants 'currently practice in the NHS - for example some members work in oncology departments/ midwives/ ICU/ GP surgeries, the voluntary sector, for example, hospices, hospitals - maternity wards/ special care units, residential care homes, autism support groups etc, as well as private practice in salons, spas, hotels, complementary therapy clinics and consultancy work'.  It appears that significant number of people access aromatherapy from private practitioners.
<ul> <li>4. Risk perception</li> <li>Need for public confidence in Aromatherapists?</li> <li>Need for assurance for employers or other stakeholders?</li> </ul>	As many registrants are likely to be self-employed, it is important that members of the public have confidence in the practitioners they choose to deliver therapy. The specific approach of IFA, which may not always be available as part of mainstream NHS services, makes it important that the public are aware of what to expect from practitioners. Since registrants may be working with children and/or vulnerable adults, it is important that the public can have confidence there are appropriate safeguards in place.

## Assessment against the Standards

#### Standard One: Eligibility and 'public interest test'

#### **Summary**

The Accreditation Panel found it is in the public interest to accredit the IFA. The Accreditation Panel found that Standard One is met.

#### **Accreditation Panel findings**

In March 2024, we completed our Standard One assessment for the IFA. We found that the public interest test was met and did not issue any conditions. During the assessment, we identified some confusion around the use of a 'specialism' category on the register, however, this was removed from the published Register during the assessment process. We considered this would help avoid potential for people to think that treatments offered by IFA registrants can help serious conditions (such as those which were being advertised as specialisms, including but not limited to, cancer).

We did not identify any other changes that could affect this Standard continuing to be met during our assessment.

#### Standard 2: Management of the register

#### **Summary**

The Accreditation Panel found that Standard Two was met.

- The IFA has clear, published processes for all routes to registration.
- The main route for registration with the IFA is through completion of an IFA Course. While successful completion of an IFA Course leads directly to membership and admittance onto the register, prospective registrants must also sign a number of declarations, confirming they are of good character. These declarations must also confirm they do not have any criminal convictions or cautions that are unspent, have not been subject to any disciplinary proceedings regarding their practice, hold professional indemnity insurance, hold a valid first aid certification and will be able to provide evidence of completion of Continual Professional Development (CPD) activities. The IFA will remove an individual from the register should it be identified that a false declaration was made.
- Completion of different courses leads to differing levels of membership with the IFA. Completion of the Professional Aromatherapy Diploma (or equivalent) leads to FULL membership. Completion of the Professional Essential Oils Therapy Diploma (or equivalent) leads to PEOT Membership and completion of the Aromacare Course leads to CARER Membership. An Associate membership is offered to those who have completed an Aromatherapy course to a level 3 or 4 standard. Each registrant will have their level of membership displayed under 'qualification' on their register entry.

- The IFA also offers a corporate membership for companies who sell products and a friend membership where no qualifications are needed.
- Notwithstanding the above, the IFA is also an awarding body. This means that
  while they offer their own vocational qualifications for membership, they also
  acknowledge and register those with qualifications from other providers.
- The IFA's 'Qualifications we Recognise' document sets out accepted
  qualifications from other vocational institutes, as well as requirements for
  admittance to the IFA register. This also ensures that applications meet the
  minimum requirements for registration and continue to do so.
- The IFA also has a clear equivalence process which is further explored in Standard Four.
- The IFA notes those all entered on the register must have met the National Occupational Standards of practice and Aromatherapy Core Curriculum Requirements as a minimum.
- In line with our minimum requirements, and the IFA's Disciplinary and Sanctions Policy, any restrictions on practice must be clearly displayed. The IFA ensure this by clearly displaying details of the disciplinary action or sanction on the register, next to a registrant's name, with a link to the 'Choose with Confidence' Page where it will outline the codes they have breached and further details of the sanction.
- The Disciplinary and Sanctions Policy also notes that cautions and conditions
  of practice will appear next to a registrant's name for the duration they are
  implemented. For registrants who are suspended or terminated, their
  registration will be removed from the register. At the completion of the
  suspension period, the registrant will be re-admitted to the register.
- The Disciplinary and Sanctions Policy and the Indicative Sanctions Policy sets out processes for re-admission to the register following disciplinary action. We note that Section 17 of the Disciplinary and Sanctions Policy details the process for re-admission to the register, following successful completion of a suspension, or a Conditions of Practice Order.
- The Indicative Sanctions Policy sets out that the IFA may strike-off a
  registrant, which is typically considered to be a permanent action. However,
  this policy also sets out that the Panel, at their own discretion, may issue with
  their original decision, that if new information comes to light, a person may
  apply for restoration to the register within five years of the date of the striking
  off order being made.

#### **Standard 3: Standards for registrants**

#### Summary

The Accreditation Panel found that Standard Three was met.

#### **Accreditation Panel findings**

 The IFA sets the standards for their registrants in their Terms and Conditions of Membership.

- The IFA's Code of Conduct also provides further guidance to registrants to ensure they are of good character, are fit to practice and meet curriculum requirements. This same document also stipulates that registrants must work within their own scope of practice.
- We also reviewed Section E of the Code of Conduct which provides guidance to registrants on the safe use of products and equipment including that registrants must only use products and equipment that they have received training on and have relevant knowledge to use.
- Further, the IFA has a Safeguarding Policy which sets out requirements for registrants and identifies their responsibilities should they be made aware of a safeguarding concern.
- The IFA have clear published ethical frameworks, such as a Code of Ethics which clearly demonstrates appropriate behaviours and sets out expectations and responsibilities of registrants. Some examples which this document highlights are politeness and consideration, honesty and integrity, maintaining fitness to practice, professional conduct, establishing and maintaining professional boundaries (including sexual boundaries and professional behaviour).
- The Duty of Candour Guidance (within the Code of Ethics) sets out the IFA's expectations for registrants to inform patients and service users that something has gone wrong, apologise and remediate concerns (where possible).
- The IFA also sets out business requirements for their registrants as further explored below.
- Registrants have a requirement to have a written complaints procedure in place which is easily accessible to their clients, in line with the Code of Conduct. Furthermore, we also reviewed the IFA's Whistleblowing Policy which sets out the criteria and process for raising a whistleblowing concern.
- The IFA have provided us with their Terms and Conditions of Membership, and section B3 (declarations) indicates that members must have met the National Occupational Standards of Practice and Core Curriculum Requirements as a minimum. As a part of this, members must also declare that: (3.4) they "hold professional indemnity insurance to practice in the UK and have the right to work in the UK." The document also notes that "if it is identified that a false declaration has been made the individual will be removed from the membership." The IFA quality assures this by requiring their registrants to provide evidence of their indemnity insurance cover at their initial registration and subsequent annual renewal of registration.
- The IFA also told us that the above must be agreed to on both initial application to the register and annual renewal. Furthermore, members must attach a certificate confirming their insurance at each annual renewal.
- The IFA has provided documentation to evidence that they have explicit requirements for advertising, as set out in their Advertising Guidelines. Further, the IFA notes that all members are required to comply with the standards provided by the Advertising Standards Authority (ASA) and Committee of Advertising Practice (CAP).

 We did not identify any concerns in relation to this standard and are satisfied the IFA have appropriate policies and procedures in place for management of their members.

#### **Standard 4: Education and training**

#### Summary

The Accreditation Panel found that Standard Four was met.

- The IFA provides a range of clinical aromatherapy courses leading to internationally recognised qualifications.
- The IFA's education and training requirements for registrants are clearly set out online and are easily accessible for both prospective registrants and lay persons.
- The IFA's curriculum is in line with the National Occupational Standards
  (NOS) given the minimum level of qualification required is equivalent to a level
  3 (England and Wales), 5 (Northern Ireland) and 6 (Scotland). The IFA notes
  their courses actually exceed the NOS and aromatherapy core curriculum
  requirements in that their courses are 680-725 hours to complete, in
  comparison to the NOS, which is 370-hours.
- We reviewed the IFA's process for quality assurance of their education and training providers which includes their Registrar obtaining information and presenting this to the Education Committee who review the course curriculum and map it against either the Aromatherapy Core Curriculum or the Professional Aromatherapy Diploma Course.
- If identified, the Registrar must also advise the Professional Standards & Registration Committee of new qualifications having been mapped and assessed as meeting the standards, to update the <u>qualifications we recognise</u> document accordingly.
- Additionally, the IFA accredits course providers and appoint External Quality
  Assurance Assessors (EQA's) to externally verify the end point assessments.
  The IFA also are a verifying organisation for the CNHC who have preapproved their course curriculum as having met the standards for acceptance
  for their register.
- We noted from the Syllabus page, the IFA advises their "syllabuses are periodically reviewed to reflect the latest developments in CAM and research to ensure practitioners engage in evidence-based practice."
- The IFA's <u>Code of Conduct</u>, <u>Ethics and Practice</u> sets out how its codes
  ensure non-discriminatory practice across their register, including for
  example, to "treat all clients fairly and equally as per the Equality and Human
  Rights Acts, which is a legal responsibility for anyone providing services to the
  public."
- The Code also sets out that while registrants have the right to choose who they accept as a client, they must not refuse a client on grounds which are

discriminatory under the Equality and Human Rights Act. The Code also stipulates that registrants must not:

- Refuse a client or lower their standard of care on discriminatory grounds including protected characteristics
- Must not allow own personal beliefs and values regarding a client's protected characteristics to prejudice their care programme.
- Must not offer services on different terms to different people or groups of people.
- Where, and if, practically possible, registrants should consider how to make services as accessible as possible to clients with disabilities and ways in which to attract a diverse client base.
- The IFA also provided us with their Aromatherapy Diploma Syllabus, directing us to Module 4.1 (Professional Practice), where we noted that on completion of this module students must be able to successfully "explain and assess the protocol of working with diverse groups of clients, demonstrate and evaluate the ability to effectively and professionally, communicate with clients and explain how personal perceptions, pre-conceptions, prejudice or silent expectations from client or practitioner can influence the therapeutic relationship."
- The IFA is an awarding body as well as a professional body for aromatherapists. This means they offer their own vocational qualifications in aromatherapy which automatically entitles successful candidates on completion of studies to IFA membership. The IFA also awards membership to those who can demonstrate they meet equivalent qualifications.
- We reviewed the IFA's Curriculum to understand if their education and training requirements included basic training about the wider health and social care systems. We found that evidence of training about the health and social care systems in the IFA's Aromatherapy Diploma Syllabus, particularly in relation to unit 4.1.6 'Complementary Therapies and Allopathic Medicine.' We noted the aims of this unit are "to ensure that students have acquired the relevant knowledge of complementary therapies and allopathic medicine, to enable them to liaise with and/or work alongside other healthcare practitioners."
- We also reviewed the register and were satisfied that the IFA specify the type and level of qualification required for entry to the register, which is evidenced on each members register entry.
- Additionally, the IFA publish clear information around equivalence routes for admittance to the register. We reviewed their 'Qualifications we Recognise' document which sets out how alternative experience will be considered for admittance onto the register.
- Overall, we were satisfied with the IFA's education and training requirements and did not identify any areas for improvement.

#### **Standard 5: Complaints and concerns about registrations**

#### Summary

The Accreditation Panel found that Standard Five was met.

#### **Accreditation Panel findings**

- The IFA's complaints procedure is easily accessible from their website under the '<u>Choose with Confidence</u>' heading. Their <u>complaints procedure</u>, which is accessible from this webpage, clearly stipulates the process for raising a complaint, including an escalation route for the complaint.
- We noted that the IFA can proceed with a complaint either informally or formally.
- A complaint may be dealt with informally in cases where there is no evidence
  of harm, or where the registrant's conduct is unlikely to result in a finding of
  impairment to practice. These complaints tend to be of 'lower risk' than those
  which are dealt with through the formal complaints procedure.
- As part of the informal complaints procedure, the IFA confirm with the complainant that they are happy for the complaint to proceed through the informal route. If a complainant does not agree to this, then the complaint will be handled through the formal complaints process, as outlined below.
- The formal complaints procedure is applicable to complaints which are higher
  risk and may raise concerns about a registrant's fitness to practice.
  Complaints which are handled through the formal complaints procedure will
  follow the <u>Disciplinary and Sanctions Policy</u>. We noted that the Disciplinary
  and Sanctions Policy sets out the actions available to the IFA upon receipt of
  a complaint.
- Further, the IFA has a clear <u>Appeals Policy</u>, which is accessible through their 'Choose with Confidence' webpage. We noted this policy sets out the scope for an appeal, in that both a registrant or complainant can appeal a decision which was made by the Complaints Policy, as a decision of a result of the Disciplinary and Sanctions Policy or due to a decision relating to an Interim Order restricting a registrants practice.
- The IFA's <u>Indicative Sanctions Policy</u> explains how sanctions should be applied in regards to fitness to practise cases. The decision as to whether a sanction should be imposed on a Registrant whose fitness to practise has been found to be impaired is a matter for the Adjudication Panel. The Adjudication Panel operates independently from the Investigation and Disciplinary Hearing Panel.

#### **Standard 6: Governance**

#### **Summary**

The Accreditation Panel found that Standard Six was met.

- The IFA is governed by a Board of Trustees who direct and manage how they
  are run. The Board of Trustees are supported by a number of committees
  including the Disciplinary & Sanctions Committee, Education & Quality
  Assurance Committee, Finance & Resources Committee, Professional
  Standards & Registration Committee, Public Relations & Media Committee
  and the Research Committee.
- All directors and committee members have clear terms of reference which are available from the IFA's website.
- The IFA has a rigorous <u>Conflict of Interest Policy</u> and further, also maintains a <u>Conflict of Interest Log</u>. Within the Conflict-of-Interest Policy, there are directions for staff regarding their responsibilities in relation to conflict of interests, as well as a process flow-chart and an annual declaration of conflict-of-interest form. This conflict-of-interest policy also notes that staff must undergo conflict of interest training to ensure their compliance with this policy.
- The IFA is governed by a Board of Trustees who are supported by numerous committees including:
  - a) Disciplinary & Sanctions Committee
  - b) Education & Quality Assurance Committee
  - c) Finance & Resources Committee
  - d) Professional Standards & Registration Committee
  - e) Public Relations & Media Committee and
  - f) Research Committee.
- We considered that the IFA have clear separation between management of their register functions, education and training provisions and their professional body. We also note that each committee includes lay membership.
- People may raise concerns about the IFA via the 'Raising a Concern about the IFA' Policy as found on the Choose with Confidence section of the IFA's website. The above policy sets out the procedure and time frame for concerns raised about the IFA and notes that the complainant will receive an email and acknowledgement within 5-working days.
- We noted the Board of Directors has ultimate responsibility for financial and organisational management of the IFA. The Board of Directors is responsible for overseeing the budget of the organisation and for ensuring that the organisation operates within a responsible, sustainable financial framework. The IFA set their budget annually. Further, the IFA have a Risk Management Policy which are reviewed by the Board of Directors on a bi-annual basis.
- In regards to strategic leadership and accountability, we reviewed the IFA's
  website where they clearly provide information pertaining to their governance
  arrangements. This is including terms of reference for both Trustee and
  Committee members.
- Further, we note that the IFA have a fair process in place for recruitment and training and seek to achieve diversity in the composition of their senior leadership Board and Committee Members. We note the IFA also advised us

that "as a general rule, all the principles of EDI are woven into all policies and procedures."

#### Standard 7: Management of the risks arising from the activities of registrants

#### **Summary**

The Accreditation Panel found that Standard Seven was met.

#### **Accreditation Panel findings**

- The IFA maintains a risk register that covers risks pertaining to registrants' personal behaviour, vulnerable client groups, technical competence, and business practices.
- These risks are reviewed and updated on a bi-annual basis by the Board of Directors.
- Further, the IFA provides supplementary guidance to their members inclusive of management of essential oils, management of contraindications, safe management of personal (patient) data and aromatherapy pertaining to different patient users (for example elderly, pregnancy).
- As part of this standard, we also checked the IFA's website to assess how clearly and accessibly it presented information about the benefits and limitations of treatments offered by registrants.
- We identified that the IFA had published information on their website relating to both the benefits and risks associated with aromatherapy. We noted the IFA provides clear information regarding the safe use of essential oils and encourages that aromatherapy is treated with the same respect and care as conventional medicine.

#### **Standard 8: Communications and engagement**

#### Summary

The Accreditation Panel found that Standard Eight was met.

- The IFA's <u>website</u> is accessible and navigation is easy. We noted the IFA has tabs at the top of their website directing users to main areas of the website for example "find a therapist" which links to the register and the complaints procedure and "courses and training" which provides members information around training which the IFA endorses or provides.
- We did note however, in the Standard One assessment completed March 2024, the IFA advised they were in the process of updating their website, however, were unable to provide a timeframe of this being completed. Despite this, we did not identify any major concerns which required intervention or oversight.
- The IFA's commitment to collaborate with Accredited Registers is evident on their "Affiliations & Commendations" website page. The IFA collaborates with other Complementary and Natural Medicine (CAM) organisations including

the Complementary & Natural Healthcare Council (CNHC) and are a member of the PSA Collaborative Group.

- The IFA clearly publishes their key processes on their website including joining the register and equivalence routes, complaints procedure (about registrants), raising concerns about the IFA which are accessible from the Choose with Confidence page, and a range of policies and procedures for registrants.
- The IFA has many different grades of membership/registration; all of which are laid out on their website under the <u>Membership Criteria & Categories</u> page. For members to reach certain levels of membership, they must obtain certain qualifications as specified on this page.
- The IFA advised they conduct <u>surveys</u> which are visible from their website. The surveys are targeted to registrants (a product use survey, and an equality and diversity survey) and users (client survey).
- It appears these surveys are used to gain registrant and public feedback to inform the IFA's work.

## Share your experience.

We did not receive any responses to the invitation to share experience of the IFA.

# Impact assessment (including Equalities impact)

We carried out an <u>impact assessment</u> as part of our decision to accredit the IFA. This impact assessment included an equalities impact assessment as part of the consideration of our duty under the Equality Act 2010.

The Accreditation Panel acknowledged that Complementary and Alternative Medicine (CAM) is more likely to be used by women than men, and also, by people in higher socioeconomic groups than those in lower socioeconomic groups. The IFA also advised us that their registrants and service users are more likely to be female than male. This means that any changes affecting accreditation status are more likely to impact woman then men. This needs to be considered in terms of access to treatment, and on individual earnings.

The IFA advises they do not consider that the costs of accreditation will result in the need to pass costs directly to registrants and from them, to service users. Registrants typically have good client retention, and so the costs of accreditation are unlikely to impact their fees.

No other issues were identified that could affect the impact assessment. The Accreditation Panel found that it was in the public interest to continue to accredit the IFA.