

Accredited Registers Impact Assessment

Accredited Register: Human Givens Institute (HGI)

Type of Review: Standard One / Full Renewal Standards 2-8

Date Approved for Panel: 8 September 2023

Introduction

Before we make a decision about accreditation, we undertake an impact assessment to understand likely effects on different groups, and the wider health system. We begin to gather the information required for the impact assessment when a Register first applies for accreditation. We consider any changes to impacts when we renew accreditation, and when taking other decisions that affect accreditation status such as imposing Conditions or suspension.

A key part of the impact assessment is consideration of equalities. The Equality Act 2010 imposes a legal duty, the Public Sector Equality Duty on all public bodies to consider the equality impact of its policies and decision making. The duty is known as the Equality Duty and it requires a public authority, in the discharge of its function to consider the following three aspects which form the basis of the duty:

- Consider the impact and eliminate unlawful (direct or indirect) discrimination and any other conduct prohibited under the Equality Act 2010.
- Advance equality of opportunity between people with protected characteristics and those who do not share these characteristics
- Foster good relations between people with protected characteristics and those who do not share these characteristics.

This means that public bodies must consider equality impact on individuals protected under the Equality Act 2010 in carrying out their work. The Authority, therefore, needs to be always mindful of the public duty when carrying out its oversight role which includes the approving of registers. It needs to have 'due regard' to the needs to balance the three aspects which make up the Equality Duty when achieving its goals.

The Equality Impact Assessment is an important tool/mechanism for demonstrating 'due regard' through the consideration of evidence and analysis, actual and potential to identify positive and/or adverse impacts. The key groups we need to consider when making our decisions are, sex, age, ethnicity, disability, religion and belief, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy, and maternity.

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Equalities impacts – summary

The HGI has a published Equality, Inclusion and Diversity Policy¹ setting out that it aims to:

- *‘work to eliminate all forms of negative discrimination, recognising that this requires not only a commitment to remove discrimination but also action through positive policies to redress inequalities wherever possible and applicable*
- *Adhere to the principles underpinning legislation, such as the Equalities Act (2010) and the Human Rights Act (1998), when designing and implementing policies*
- *Regularly evaluate our policy and procedures and the impact of these on individuals or groups based on age, gender, ethnicity, disability, religion, race, belief or sexual orientation.’*

This page sets out that its approach includes HGI employees, members and registrants, and those involved in its complaints processes.

The HGI highlighted as an example of its approach that registration applications are ‘sanitised’ so as to reduce risk of unconscious bias in decision making. The HGI advised that its Membership Secretary and RPSC Coordinator are available to support applicants who may have additional requirements.

At the time of assessment, we were not sure if the HGI collects information on the ethnicity or diversity status of registrants. Application processes do not require practitioners to provide data on protected characteristics or other information that may help identify impacts on registrants. The Authority’s new Standard Nine: Equality, Diversity and Inclusion may direct the HGI to start collecting registrant information to assess such impacts, if no specific mechanism is in place.

We have not seen evidence that the HGI collects information on the use of humanistic therapies by different client-groups, including protected and non-protected groups. Such information may assist the HGI to develop policies to address issues related to specific groups, and standards address specific risks.

We were concerned that the HGI did not make explicit reference to the risk of registrants practising conversion therapy in its codes or guidance. 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. The HGI confirmed to us that it fully supports the Accredited Registers programme’s stance against

¹ <https://www.hgi.org.uk/about-hgi/equality-inclusion-diversity-policy>

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conversion therapy, however we did not consider this was clear to the public. We have suggested the Panel consider whether a Condition or Recommendation be issued for the HGI to make its position clear within its Codes, that any registrants who offer or provide conversion therapy may be subject to disciplinary processes.

We noted that the evidence base for human givens therapy was limited. This was recognised by the HGI who highlighted that

as a ‘relatively new approach we are still building our evidence base. It is our intention to continue to seek research partnerships to further explore the effectiveness of HG therapy’.

With that noted, human givens therapies purport to offer effective treatments for people with mental health concerns that are short term and offer practical steps to improvement. The HGI considered this was welcomed by the majority of clients, who may be over 65 years of age. It is also suggested that human givens treatments may be beneficial to those with trauma, or multiple traumas, who may see benefit from only a few sessions. As noted below, this may make treatment more accessible to those with concerns about ongoing cost, or length of commitment to treatment, whether through private care, charity or NHS provider. We note the risk however that this relatively new modality, with developing evidence, will need effective safeguards to assure that people requiring escalation to other forms of treatment are appropriately referred.

Impacts on groups with protected characteristics

Age

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Positive	People over 65 years of age	The HGI identified that majority of clients fall into that age group. It noted that registrants are often in a new career, and able to relate. Older clients may be seeking ‘ <i>practical steps that provide effective interventions</i> ’ as offered within HG therapy.		July 2023

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Disability

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Positive	<p>People with anxiety, depression or other mental health issues.</p> <p>Veterans and others with PTSD and other traumatic experience.</p>	<p>Anxiety may be a disability if it has a substantial and long-term adverse effect on peoples' ability to carry out normal day-to-day activities. The HGI evidences high rates of successful treatment for people with mental health issues.</p> <p>In particular, members of the Armed Forces Community can receive mental health support and therapy through Human Givens Therapy from the UK-based UK- charitable provider PTSD Resolution. Human givens therapy appears to be helpful in the treatment of posttraumatic stress in veterans.</p>		July 2023

Gender reassignment

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral	People who have or may undertake gender reassignment	Although the HGI has a positive approach to Equality, Diversity and Inclusion we were however concerned that the HGI appeared to have taken	<p>We set the following Condition of Accreditation:</p> <ul style="list-style-type: none"> The HGI must set explicit requirements that its registrants must not offer 	July 2023

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		no public position on conversion therapy.	or provide Conversion Therapies. This must be completed within three months.	
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Marriage and civil partnership

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral				

Pregnancy and maternity

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral				

Race

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral				

Religion or belief

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral				

Sex

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral				

Sexual orientation

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified

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Neutral	People who are LGBTQ	Although the HGI has a positive approach to Equality, Diversity and Inclusion we were however concerned that the HGI appeared to have taken no public position on conversion therapy.	We set the following Condition of Accreditation: <ul style="list-style-type: none">The HGI must set explicit requirements that its registrants must not offer or provide Conversion Therapies. This must be completed within three months.	July 2023
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Cost and market impacts – summary

The HGI's human givens therapists may work in private/self-employed settings, or in other settings. The HGI stated a minority may work in the NHS.

The Authority's accreditation of the HGI may encourage people to prefer services offered by its registrants, and also for mental health providers to refer to such registrants.

Human Givens therapies are notable for their short term approach that initial studies show may be effective, as noted within the Standard One assessment:

- 'Overall, 69 per cent of clients were defined as recovered or reliably improved according to their CORE scores, in an average of four one-hour sessions'
- 'the efficacy of HG Rewind treatment for PTSD and trauma was examined by a controlled, multi-methods design study, which suggested that *rewind is a promising alternative trauma treatment because it does not require discussing specifics of the trauma, can treat multiple traumas in one session, and may require fewer treatment sessions*'

Promotion of the HGI and its therapists through re-Accreditation may mean that more people are able to access treatment that is short-term and potentially more affordable than other forms of counselling and psychotherapy. As noted in the assessment, it is important that HGI registrants are competent to treat issues within their scope of practice, but able to identify and refer to more suitable treatment where appropriate.

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We had concerns that the HGI's statements on mental health conditions affecting vulnerable groups, including children and young people, could potentially deter individuals from seeking or being referred to established mainstream treatments when necessary. To mitigate these risks, we issued Conditions of Accreditation.

Social and environmental impacts – summary

Greater recognition of registrants on Accredited Registers, who are appropriately trained and meet standards of conduct, competence and business practice, may help increase access to mental health services and reduce risks of harm from seeing unregistered or unregulated practitioners.

Decision

The Panel noted the actions above and considered the Conditions and Recommendations highlighted as part of the assessment. The Panel agreed with these actions.