



General  
Osteopathic  
Council

# Consultation on draft guidance on insurance requirements for osteopaths

A consultation on guidance for osteopaths

[insert date]

# Annex B to 11

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## About the General Osteopathic Council

The General Osteopathic Council (GOsC) is the regulator for the osteopathic profession in the UK. Our role is to develop and regulate the profession of osteopathy which we do by setting standards of education, training, conduct and competence and keeping a Register of those who have qualified and met those standards. By law, osteopaths must be registered with us in order to practise in the UK; there are currently around 5,400 registered osteopaths.

One important aspect of our work is dealing with concerns and complaints about osteopaths. We have legal powers and clear and transparent processes to investigate and deal with osteopaths who may fall short of the standards we have set.

## The consultation

In this consultation, we are inviting views on our draft Guidance on Insurance Requirements for Osteopaths.

Since the beginning of 2018, the GOsC has opened 14 investigations relating to an alleged failure to maintain adequate professional indemnity insurance (PII).

To address our concerns that osteopaths are placing their patients at risk by practising without appropriate insurance in place, the GOsC has continued to take active measures to raise awareness amongst registrants about their duty to maintain both PII and also public liability insurance. For example,

- a. Standard D1 of the Osteopathic Practice Standards states: 'You must act with honesty and integrity in your professional practice', and the updated guidance now provides explicitly that osteopaths 'must have a professional indemnity insurance arrangement which provides appropriate cover in accordance with the requirements of the Osteopaths Act 1993 and the current Professional Indemnity Insurance Rules'.
- b. We continue to promote the importance of having adequate and appropriate insurance, including explaining the requirements through our communications. For example, we have published articles in The Osteopath magazine, featured it on the carrier sheet that accompanies the magazine, promoted it since January 2018 through our monthly news ebulletin and via our social media platforms. The March/April 2019 issue of The Osteopath magazine included a detailed article outlining the difference between PII and public liability insurance and explaining osteopaths' requirements in relation to both.

The proposed draft Guidance, which appears at the Annex [insert Annex], is also part of our ongoing work to raise awareness about insurance requirements for the profession. The purpose of this guidance is to provide a clear overview of the requirements in relation to both PII and public liability insurance for osteopaths. In addition, it addresses the main issues that have arisen in practice at indemnity insurance cases at Professional Conduct Committee (PCC) hearings.

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The draft Guidance outlines the provisions within the Osteopaths Act 1993 (as amended) and the General Osteopathic Council (Indemnity Arrangements) Rules Order of Council 2015 as they relate to PII cover. It also sets out the requirements as outlined in the Osteopathic Practice Standards, effective from 1 September 2019.

The intended purpose of the document is to provide clear information about the requirement to have both adequate PII and public liability insurance in place while registered with the GOsC.

In addition, the draft Guidance captures key points derived from feedback we have received from the Professional Standards Authority where 'learning points' were identified to assist the PCC in the approach they take to PII cases. These learning points were also published in the article about PII in the February/March 2018 issue of The Osteopath magazine.

Please read the draft Guidance on page [x] before answering the consultation questions below.

### How to respond

The deadline for responses to this consultation is [insert date].

You can send us your views by responding to our online consultation at: [link]

If you would prefer, you can email: [regulation@osteopathy.org.uk](mailto:regulation@osteopathy.org.uk) or post your response to:

Guidance on Insurance Requirements for Osteopaths  
General Osteopathic Council  
Osteopathy House  
176 Tower Bridge Road  
London SE1 3LU

Copies of the draft Insurance Guidance, and this consultation response form, are also available on request in other formats by emailing [regulation@osteopathy.org.uk](mailto:regulation@osteopathy.org.uk) or by calling 020 7357 6655 x224.

**As set out above, we are asking some specific questions that we would like responses to, but you are welcome to offer any other comments you wish. All feedback will be taken into consideration.**

Information in responses, including personal information, may need to be published or disclosed under the access to information regimes (mainly the Freedom of Information Act 2000, the General Data Protection Regulation, the Data Protection Act 2018 and the Environmental Information Regulations 2004). We will publish a report about the consultation and the responses we have received. If you would prefer your name not to be made public, please indicate this when sending us your views.

## **Annex B to 11**

The GOsC is a data controller registered with the Information Commissioner's Office. We use personal data to support our work as the regulatory body for osteopaths. We may share data with third parties to meet our statutory aims and objectives, and when using our powers and meeting our responsibilities under the Osteopaths Act and the associated rules made under the Act. We may use personal data to update the Register, administer and maintain the Register, process complaints, compile statistics and keep stakeholders updated with information about our work.

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## Consultation questions

### Draft Guidance on Insurance Requirements for Osteopaths

1. Your name or your organisation if replying on behalf of an organisation (optional)

2. Did you find the draft Guidance clear and informative?

Yes

No

Please provide any suggestions about how the Guidance might be made clearer

3. Does the draft Guidance provide a comprehensive overview of the insurance requirements for registered osteopaths?

Yes

No

Please provide below suggestions for what you consider could be added to the Guidance to improve understanding of osteopaths' insurance requirements

4. What is your view on the inclusion of the key learning points in the draft Guidance that have arisen in fitness to practise hearings?

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5. Do you have any other comments on the draft Guidance?

6. Do you consider that the approach proposed in this consultation supports our overarching objective of public protection?

- a. protecting, promoting and maintaining the health, safety and well-being of the public
- b. promoting and maintaining public confidence in the profession of osteopathy
- c. promoting and maintaining proper professional standards and conduct for osteopaths

Yes	<input type="checkbox"/>
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No	<input type="checkbox"/>
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Please provide additional comments below

### Diversity questionnaire

We would also like to ask some questions about you. Completing the diversity questionnaire is optional (to be added to final consultation document), but we would welcome information about our respondents. We ask for this information to help us analyse the consultation responses to help ensure we are not inadvertently discriminating against any particular group. We are also required as an organisation to monitor diversity.

It would be very helpful to us if you would provide this information. You can skip any questions you do not wish to answer.

**Thank you for your response to this consultation**