

National Council for



Osteopathic Research

**Types of concerns and complaints raised about
osteopaths and osteopathic services in 2013 to 2021**

Dr Dawn Carnes
Professorial Research Fellow. UCO.
www.ncor.org.uk

Summary

The pandemic during 2020 and 2021 has had an impact on both the number and nature of concerns and complaints raised, during 2021 we expected figures to return to pre-pandemic figures.

Complaints in 2021 were made about 138 osteopaths compared to the 7 years' average of 153 osteopaths (2013 -2019). In 2020, the year most affected by the COVID19 pandemic, 103 complaints were made.

There were 150 concerns and complaints raised in 2021 (including false/misleading advertising complaints) compared with an 8 year mean of 254 (199 without the false/misleading advertising complaints). This is the second lowest number of complaints (2020 being the lowest) probably reflecting the recovery of clinical practices during 2021.

Most complaints were reported about males, who were over 50 years old and who have been in practice more than 10 years. Male osteopaths were more likely to be complained about than female osteopaths: 48% of registered osteopaths were male but 64% of all complaints were about males. In terms of age, proportionately more male osteopaths were complained about if over 50 years old (51-60 years: 1.7% of registered male osteopaths were complained about compared to 0.9% females, 61-70 the proportion was 3% males vs 0.9% females and 70 years+ 3.2% male and 0% females). However, the number of complaints did not appear to be associated with an osteopath's years of experience. The proportion of osteopaths complained about with 0-2 years, 3-5 years and 6-10 years and 10 + years of experience were roughly the same when we compared the number of complaints against the number of registered osteopaths in each group (range 1.5% to 2.2%).

Notable areas of concerns and complaints for 2021 were:

- No diagnosis / inadequate diagnosis (8 year mean 5.5 concerns, 2021 concerns raised n=11)
- Failure to refer (8 year mean 2.5 concerns, 2021 n=9)
- Failure to maintain professional indemnity (8 year mean 5.5 concerns, 2021 n=6)
- Communicating inappropriately (8 year mean 36 concerns, 2021 n=22)
- Sexual impropriety (8 year mean 12.5 concerns, 2021 n=12)
- Complaints about 'conduct bringing the profession into disrepute' (8 year mean 9.7 concerns, 2021= 13).

When the concerns and complaints were mapped against the Osteopathic Practice Standards (OPS) we can see that 'Quality and Safety' and 'Professionalism' remained the areas of most concerns.

There is still room for improvement in professionalism, respecting patient rights, and clinical care.

Contents	Page
Introduction	4
Methods	4
Profile of those complained about	6
Types of Concerns and complaints	10
Clinical Care	14
Management	15
Relations	16
Adjuvant	17
Criminal convictions and cautions	18
Regulation specific	18
Implications for OPS	19
Discussion and Conclusion	20
Appendices	
1. Raw data	22
2. Mapped concerns and complaints to OPS	28

Introduction

Concerns and complaints made by patients, public and health care sector workers and health care professionals about health care practitioners are crucial to understand in order to prevent issues around poor practice in the future. We have been collecting data about concerns and complaints made by the general public about osteopaths and osteopathy since 2013. These data are analysed each year and inform policy, practice and the education of osteopaths.

Stakeholders and interested parties contributing to this project are the osteopathic regulator, the General Osteopathic Council (GOsC), the osteopathic professional body, the Institute of Osteopathy (iO), and three insurance companies who provide cover for osteopaths.

Classification System

We use a modified version of the Healthcare Complaints Analysis Tool (HCAT) (Reader T, Gillespie A, Roberts J. Patient complaints in healthcare systems: a systematic review and coding taxonomy. *BMJ Qual Safety*. 2014; 23:678-689) to classify concerns and complaints. We collect raw frequency data only; we do not rate the concerns and complaints by severity of harm, or the problem raised.

There are six distinct categories we use to classify the concerns and complaints:

1. Clinical concerns and complaints sub-divided into Quality and Safety issues.
2. Management: Environment (Problems in the facilities, services, clinical equipment, and staffing levels), Business/Processes (Problems in bureaucracy, waiting times, and accessing care).
3. Relationships sub-divided into Communications, Humaneness/Caring and Patient rights.
4. Use of adjuvant therapies.
5. Criminal convictions and cautions
6. Regulation specific issues.

We used all the 36 subcategories recommended in the HCAT as these matched and mapped well onto the original classification system used between 2013 and 2018.

The classification system adopted in 2019 has subcategories that are more fully described so there is less potential for overlap.

Methods

Data were collected from January 1st 2021 to December 31st 2021.

Contributors include the regulator (General Osteopathic Council, GOsC), the osteopathic professional body (The Institute of Osteopathy, iO) and three insurers of osteopaths.

Data are logged and recorded directly as a result of patients and the public informing the contributing organisations of a concern or complaint they would like to report. This can be by telephone, email or letter correspondence. Concerns and complaints that are escalated to the regulator are only reported by the GOsC to limit duplication.

We do not collect data about those making the complaints, only those that are complained about.

Data were collected and input onto a standardised excel spreadsheet. All potentially identifiable data were removed, and the spreadsheets were submitted to the National Council for Osteopathic Research for independent analysis.

Descriptive data are presented and year on year comparisons are made.

The data were analysed in two sections with details about the profile of those complained about and the types of concerns and complaints that were received over the 12-month period.

Overall summary analysed data are provided and then more detailed analysed data by subcategories are given. Raw data are contained in the Appendix 1.

Subcategories have been mapped against the Osteopathic Practice Standards which can be found in Appendix 2.

Profile of those complained about

There were 150 complaints raised about osteopaths in 2021, and about 138 individual osteopaths.

Among the osteopaths complained about 49 (36%) were female and 89 (64%) male, representing 2.6% of all registered osteopaths. The 5 year mean percentage of registered osteopaths complained about was 2.7%.

Table 1. Number of people who had concerns and complaints raised against them and their gender

Year (number of GOSc registrants)	Total number of osteopaths complained about (% of register)	Males (% of total) (% of registered males)	Females (% of total) (% of registered females)
2016 (Total 5,200, Males 2,563 Females 2,637)	203 (3.9%)	130 (64%) (5.1%)	73 (36%) (2.8%)
2017 (Total 5,288, Males 2,618 Females 2,670)	169 (3.2%)	106 (63%) (4%)	63 (37%) (2.4%)
2018 (Total 5,334, Males 2,629, Females 2,705)	127 (2.4%)	82 (65%) (3.1%)	45 (35%) (1.7%)
2019 (Total 5,457, Males 2,684, Females 2,773)	113 (2.1%)	78 (69%) (2.9%)	35 (31%) (1.3%)
2020 (Total 5,443, Males 2,656 Females 2,787)	103 (1.9%)	79 (76.7%) (2.9%)	24 (23.3%) (0.9%)
2021 (Total 5,335, Males 2,599 Females 2,736)	138 (2.6%)	89 (64%) (3.4%)	49 (36%) (1.8%)

Most of the osteopaths that are complained about come practise in England, but this reflects the larger number of osteopaths based in England.

Table 2 Location of work of those complained about

Country	Number of osteopaths complained about in 2021
England	122
Northern Ireland	1
Scotland	5
Wales	6
Other (non-UK)	0

Gender and age

Table 3 and Figures 1 a and b show that the age groups 51+ are proportionately more likely to be complained about. Figure 1 a shows the age and gender distribution of all registered osteopaths and Figure 1 b the age and gender distribution of those complained about, where the totals show a shift in the curve to the right (older age ranges). This pattern is more pronounced in males. In the last five years disproportionately more older males had complaints made about them.

Table 3. Age and gender distribution of total GOsC registrants and those complained about in 2021

Register	Age Bands	20-30	31-40	41-50	51-60	61-70	71+	Total
Gender	Male	306	499	658	745	323	68	2599
	Female	418	641	745	689	218	25	2736
Total		724	1140	1403	1434	541	93	5335
Complained about	Male	7	14	13	25	16	3	78
% of total register	Male	1%	1.2%	0.9%	1.7%	3%	3.2%	
Complained about	Female	6	11	12	13	5	0	47
% of total register	Female	0.8%	1%	0.9%	0.9%	0.9%	0%	
Total osteopaths complained about		13	25	25	38	21	3	125*
Total % against register		1.8%	2.2%	1.8%	2.6%	3.9%	3.1%	

*Missing data n=13

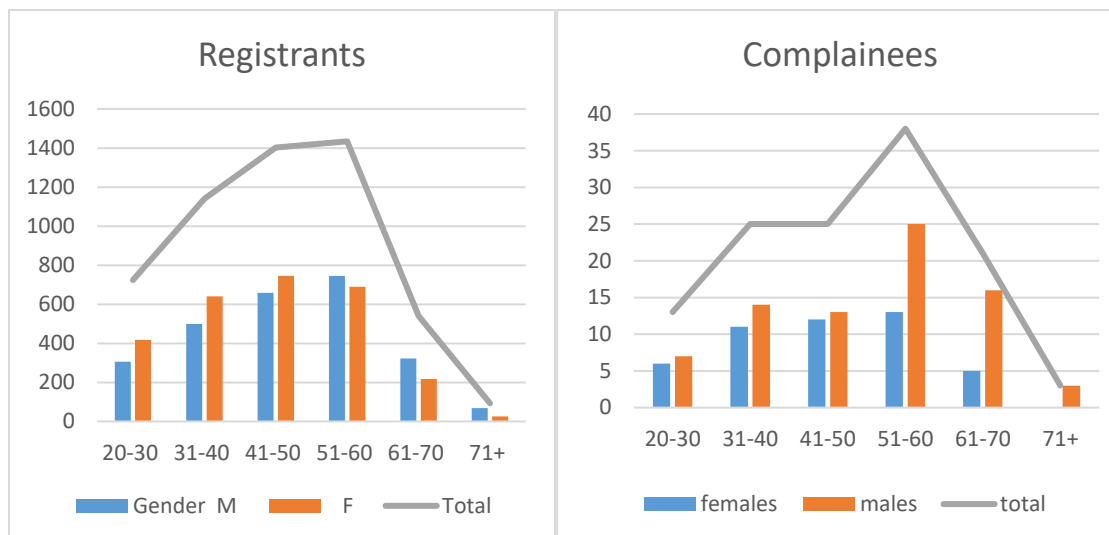


Figure 1a Age and gender distribution of registrants

Figure 1b. Age and gender distribution of complainees

Years of Experience (years post-registration)

Table 4 and Figure 2 show that osteopaths with more than 10 years’ experience have more complaints raised about them than those with less experience (57% vs 39%). Among the 47% of osteopaths with over 10 years’ post-registration, they had more than 21 years of experience.

Table 4. Distribution of complaints and practitioners’ years of practice

Characteristics	Number of osteopaths (% of total complained about by years’ experience)					
	2016	2017	2018	2019	2020	2021
Years post-registration						
0-2	3 (1%)	8 (4%)	0	7 (6%)	10 (10%)	13 (9%)
3-5	38 (19%)	23 (13%)	22 (17%)	18 (16%)	15 (15%)	19 (14%)
6-10	31 (15%)	37 (20%)	11 (9%)	15 (14%)	17 (16.5%)	22 (16%)
>10	130 (63%)	89 (48%)	85 (67%)	71 (45%)	48 (47%)	79* (57%)
Missing data	3 (1%)	27 (15%)	9 (1%)	2 (2%)	23 (22%)	5 (4%)
Total	205	184	127	113	103	138

*37/79 of the >10 years’ experience had more than 21 years of experience post-registration

However, if we look at the GOsC register, 59% of osteopaths registered with the GOsC have been practising for >10 years, and the remaining 41% less than 10 years. Table 5 shows the number of registered osteopaths by years of experience, and we can see proportionately, rather than in gross numbers, that osteopaths with more experience are **not** more likely to be complained about. Complaints are fairly evenly spread across years of experience.

Table 5 Proportion of osteopaths on the GOsC register complained about

Characteristics	GOsC registrants (% of total registrants)	% of osteopaths on register complained about (number of osteopaths complained about)		
		2021	2020	2019
Years post-registration				
0-2	510 (10%)	2.5% (13)	1.9%	0.9%
3-5	671 (13%)	2.8% (19)	2.2%	2.5%
6-10	1007 (19%)	2.2% (22)	1.7%	2%
>10	3147 (59%)	2.5% (79)	1.5%	2%
Total	5335 (100%)			

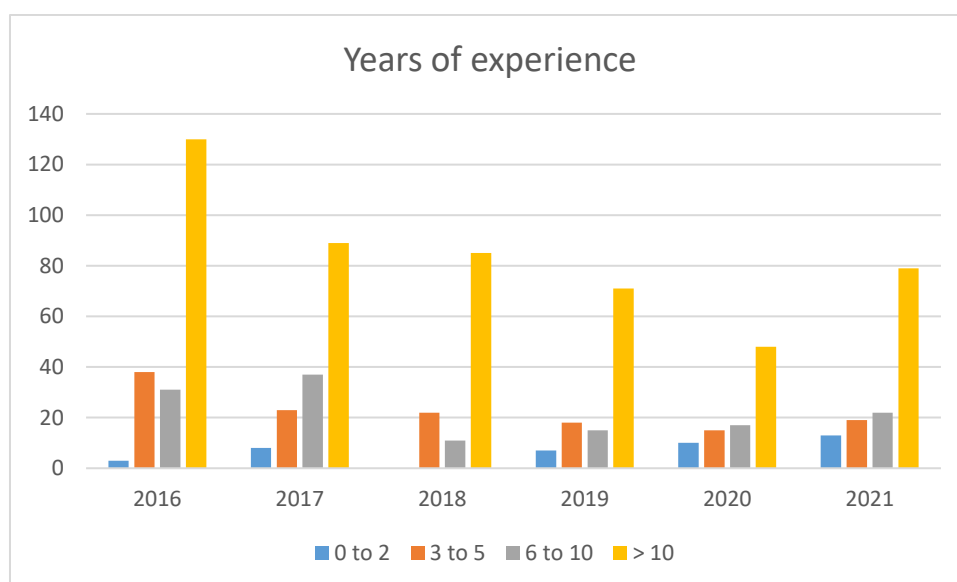


Figure 2. Distribution of complaints by years of osteopathic practice 2016 - 2021

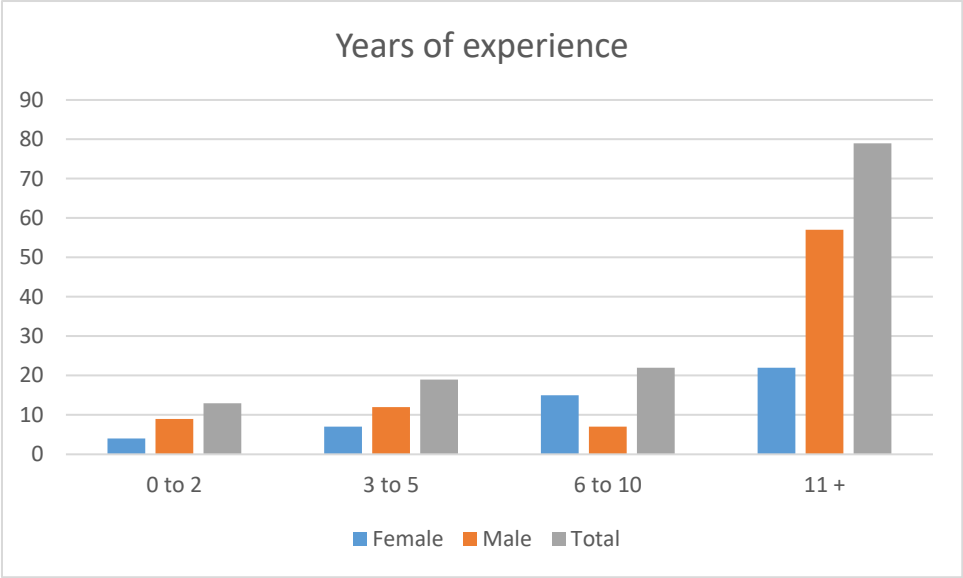


Figure 3. Numbers of males and females complained about by years of experience 2021

Types of concerns and complaints

The number of concerns raised in 2021 were 150, an increase from the previous year of 115. The 2020 figures were low as a result of the COVID19 pandemic resulting in clinic closures and two national lockdowns. During 2021 many clinics re-opened. However, the number of osteopaths registered with the GOsC was lower than the previous 2 years, and around the same number registered in 2018 when there were 188 complaints made. The 150 complaints reported in 2021 are the second lowest number recorded in 9 years.

Concerns raised about clinical care make up nearly half of all complaints (49%), with relationship issues making up a further quarter (25%) (Table 6).

The mean total number of complaints from 2013 – 2020, including false advertising was 254 and without the false advertising complaints this was 199. The 150 complaints for 2021 are significantly lower.

Table 6. Overall numbers of concerns and complaints raised each year by theme

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Clinical Care Issues (relating to quality and safety of clinical and osteopathic care provided)	83	137	104	128	97	71	70	33	74
Management Issues (relating to the environment and organisation within which healthcare is provided)	32	37	28	26	17	28	30	17	16
Relations Issues (relating to the behaviour towards the patient or their family/friends)	81	65	79	75	56	67	74	33	37
Adjuvant therapies / Professions	2	3	1	2	2	1	2	3	3
Criminal convictions / Police cautions	3	6	1	1	2	2	4	4	6
Regulation specific issues			0	1	17	15	34	17	13
Subtotal	200	248	213	233	191	184	214	107	149
False/misleading advertising*	3	9	156	177	80	4	5	8	1
Total	203	257	369	410	271	188	219	115	150

Figure 4. shows the data from Table 6 in a graphical form. There is a slight increase in complaints relating to relationship issues but still less than 2018 and 2019 and an increase in concerns about clinical care to 2018 and 2019 levels.

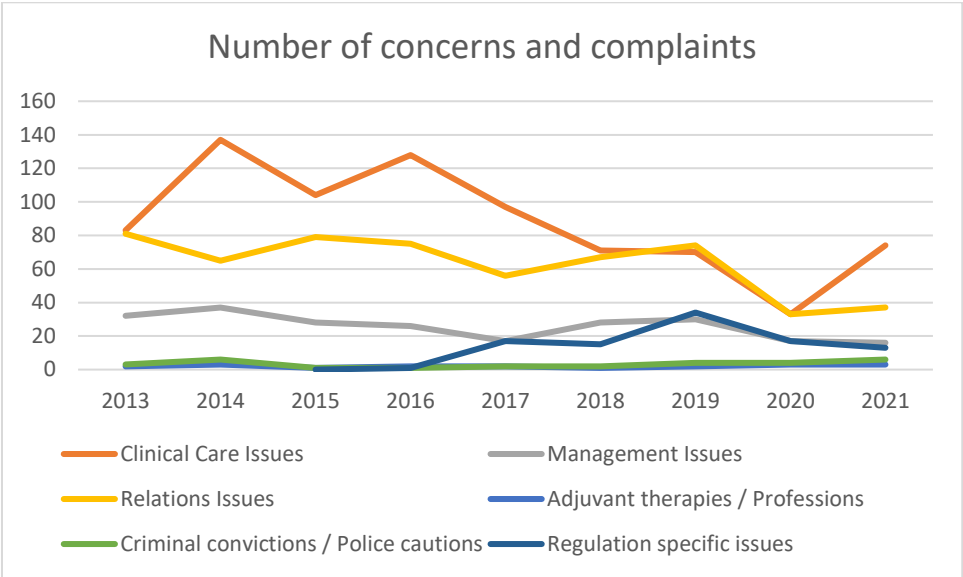


Figure 4. Overall numbers of concerns and complaints raised each year by theme

Table 7 shows the mean values of the previous years of data and allows us to compare 2021 data with the average over the last 8 years for each theme and sub-theme. The data shows all figures are below the average with the exception of adjuvant therapies and criminal convictions, but both figures are within the ranges of previous years.

The large mean for business/processes is due to the data about false misleading advertising which was subject to a campaign for change during 2015 and 2016.

Table 7. Overall comparison with previous years

Theme	Mean 2013-2020 (range)	2021
Clinical Care Issues		
Quality of clinical practices	20 (range 10-32)	19
Safety of clinical practice	70 (range 23-115)	55
Management		
Environment	6 (range 2-9)	5
Business /Processes	76 (range 16-198)	11
Relationship Issues		

Listening and Communication	36 (range 13-49)	22
Respect and Patient rights	30 (range 20-42)	15
Adjuvant therapies / professions	2 (range 1-3)	3
Criminal convictions and Police Cautions	3 (range 1-6)	6
Regulation specific (2015-2019)	14 (range 0-34)	13

Table 8. Number of Concerns and complaints per year: 2013 to 2021

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Clinical Care Issues (relating to quality and safety of clinical and osteopathic care provided.)									
Quality of clinical practices (Clinical standards of behaviour)	20	22	15	25	32	17	19	10	19
Safety of clinical practice (Errors, incidents, and staff competencies)	63	115	89	103	65	54	51	23	55
Management Issues (relating to the environment and organisation within which healthcare is provided (e.g. administrative, technical, facilities and management of staff)									
Environment (Problems in the facilities, services, clinical equipment, and staffing levels)	7	9	7	3	5	2	8	9	5
Business /Processes (Problems in bureaucracy, waiting times, and accessing care)	25	28	21	23	12	26	22	16	11
Relations Issues (relating to the behaviour towards the patient or their family/friends)									
Listening and Communication (Disregard or do not acknowledge information from patients. Absent or incorrect communication to patients)	47	34	37	49	28	39	42	13	22
Respect and Patient rights (Disrespect or violations of patient rights)	34	31	42	26	28	28	32	20	15

Other									
Adjuvant therapies / Professions	2	3	1	2	2	1	2	3	3
Criminal convictions / Police cautions	3	6	1	1	2	2	4	4	6
Regulation specific issues			0	1	17	15	34	17	13
Subtotal	200	248	213	233	191	184	214	107	149
False/misleading advertising**	3	9	156	177	80	4	5	8	1
Total	203	257	369	410	271	188	219	115	150

Clinical Care

Clinical care issues relate to quality of clinical practice and safety of clinical practice.

Figure 5a shows an above average number of concerns and diagnoses and the health of the osteopath to deliver care. Figure 5b showed an above average number of concerns about referring and treatment being delivered incompetently.

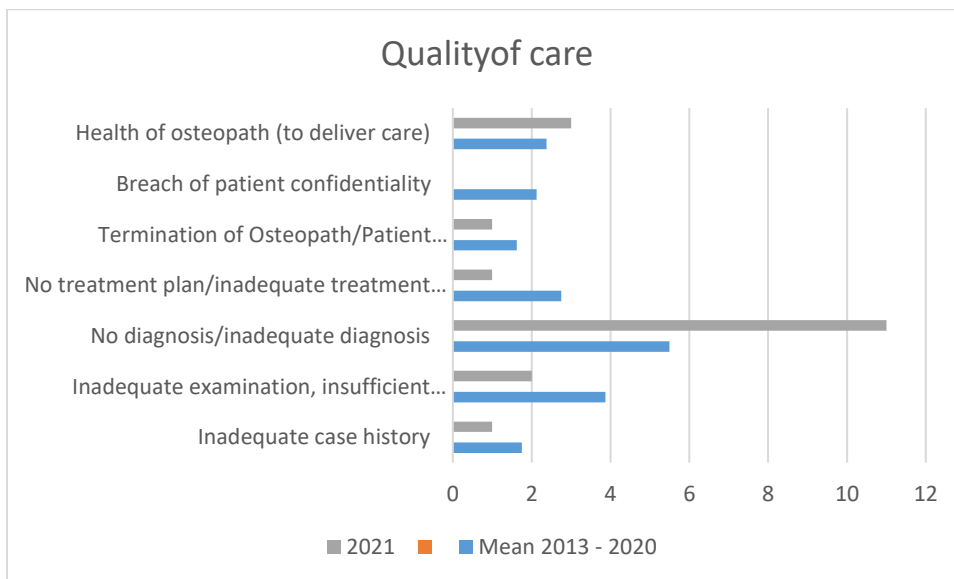


Figure 5a. Clinical Care Issues (relating to quality of clinical and osteopathic care provided).

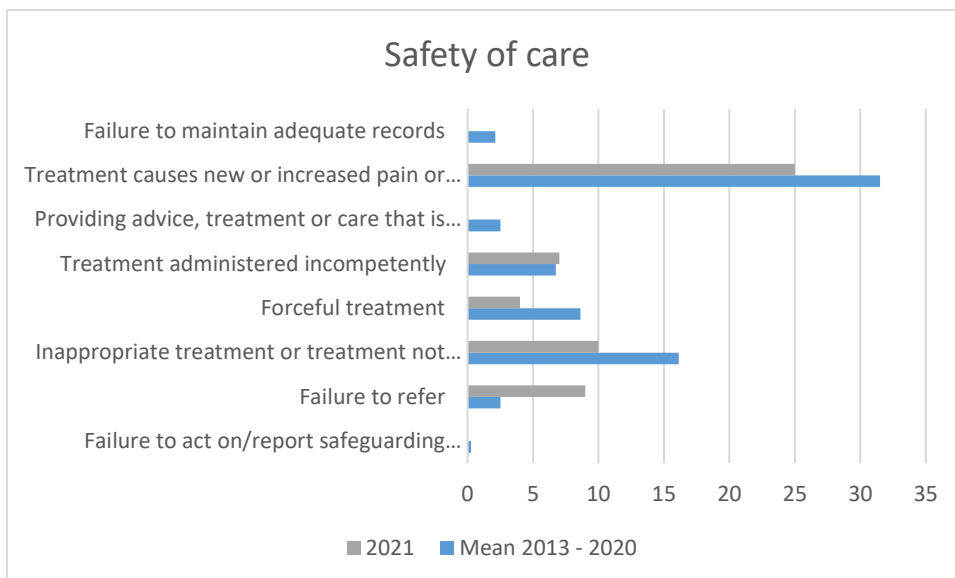


Figure 5b. Clinical Care Issues (relating to safety of clinical and osteopathic care provided).

Management

This theme records complaints about the practice environment such as problems in the facilities, services, clinical equipment, staffing levels, and business processes and procedures such as problems in bureaucracy, waiting times, and accessing care.

Not controlling the spread of communicable diseases and unclean, unsafe practices were above average, as was the case during 2020 and the onset of the COVID19 pandemic.

Concerns about business practices and processes were very low.

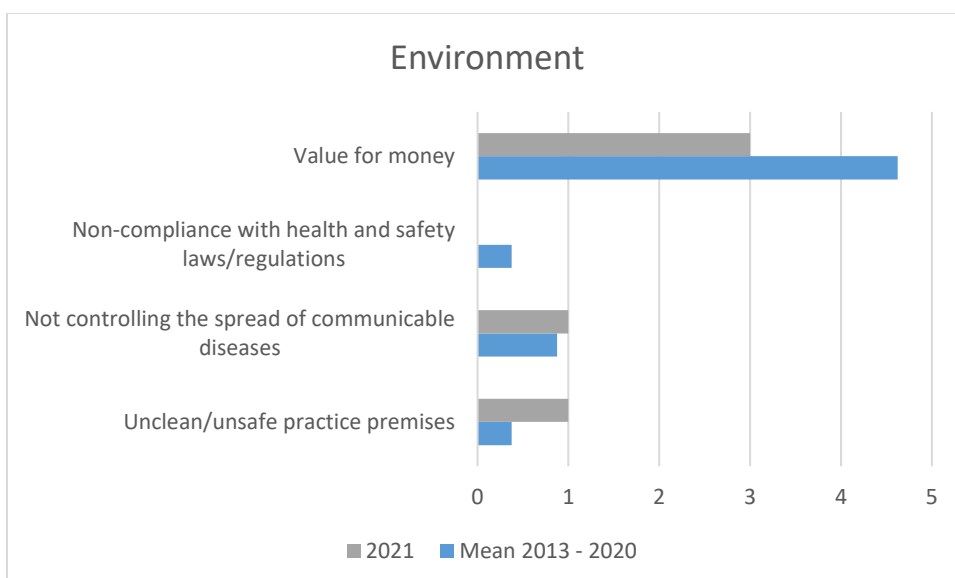


Figure 6a. Management Issues relating to the environment (excluding false advertising complaints (2021 n=1, mean2013-2020 = 55))

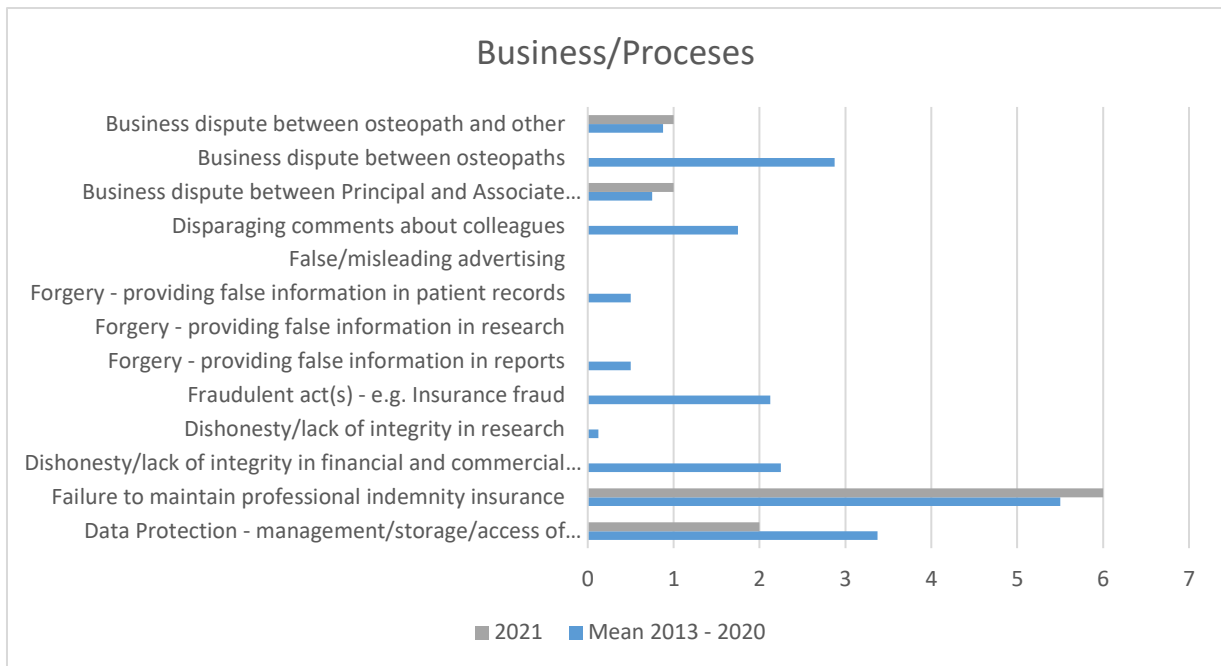


Figure 6b. Management Issues relating to the organisation within which healthcare is provided

Relationship Issues (relating to the behaviour towards the patient or their family/friends)

This theme consists of two sub-themes: Listening and Communication such as disregarding or not acknowledging information from patients and absent or incorrect communication to patients, and Respect and Patient rights such as disrespecting or violating patient rights. There are 10 sub-categories.

There were no concerns and complaints raised about consent and slightly more than average complains about communicating inappropriately (Figure 8a). Figure 8b shows that the numbers of concerns and complaints around sexual impropriety are around the 8-year average despite the overall number of complaints being low. This indicates proportionally this figure is higher than would be expected.

Examples of inappropriate communication were: Rude remarks towards a patient about their weight, inappropriate/unjustified comments about pregnancy relating to the covid vaccine and inappropriate comments that were construed as racist.

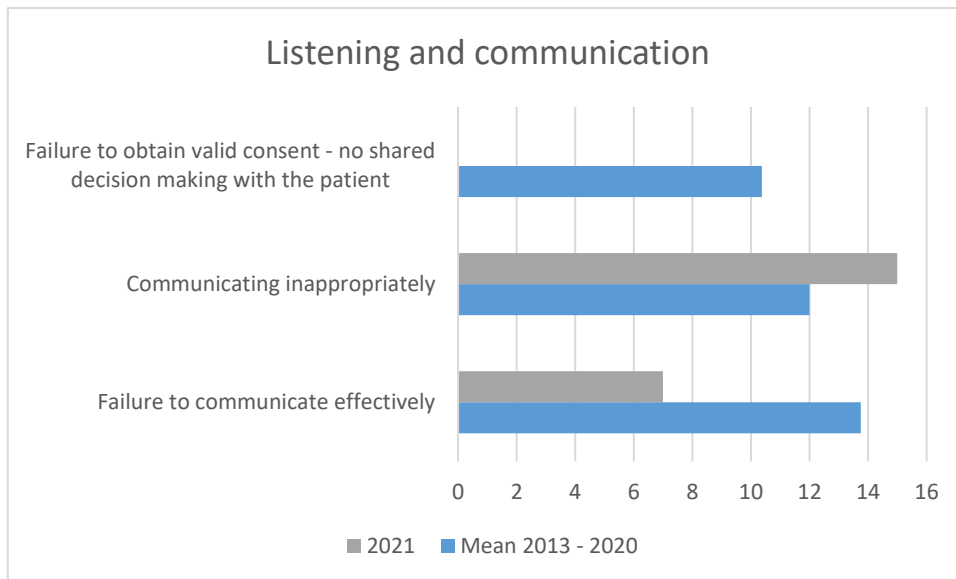


Figure 8a Listening and Communication (Healthcare staff disregard or do not acknowledge information from patients. Absent or incorrect communication from healthcare staff to patients)

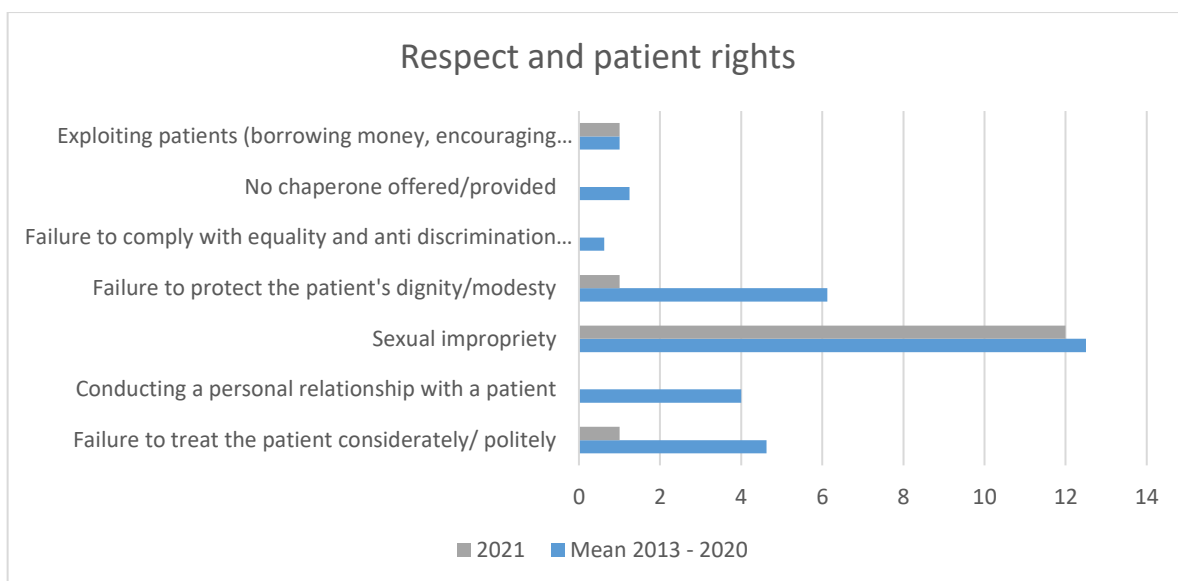


Figure 8b Respect and patient rights (Disrespect or violations of patient rights)

Adjuvant therapy

The number of concerns and complaints in this area remain very small and focuses on acupuncture and dry needling.

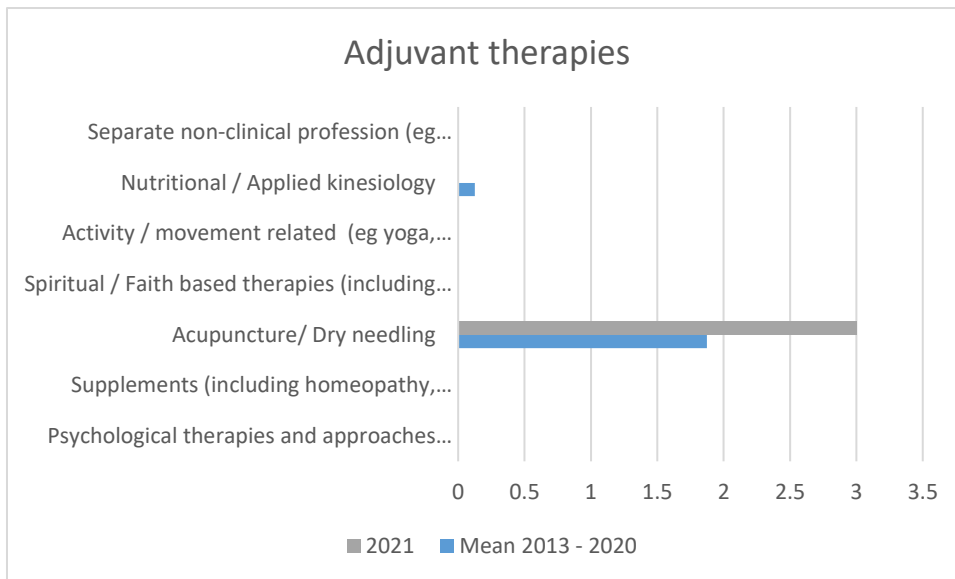


Figure 9. Adjuvant therapies and professions

Criminal convictions and police cautions

These data increased this year for the first time, since 2013, we saw a conviction for theft and 5 concerns reported in the 'other' category. These related to an osteopath being convicted for obstructing the highway as part of a protest, as well as cautions for driving offences (speeding).

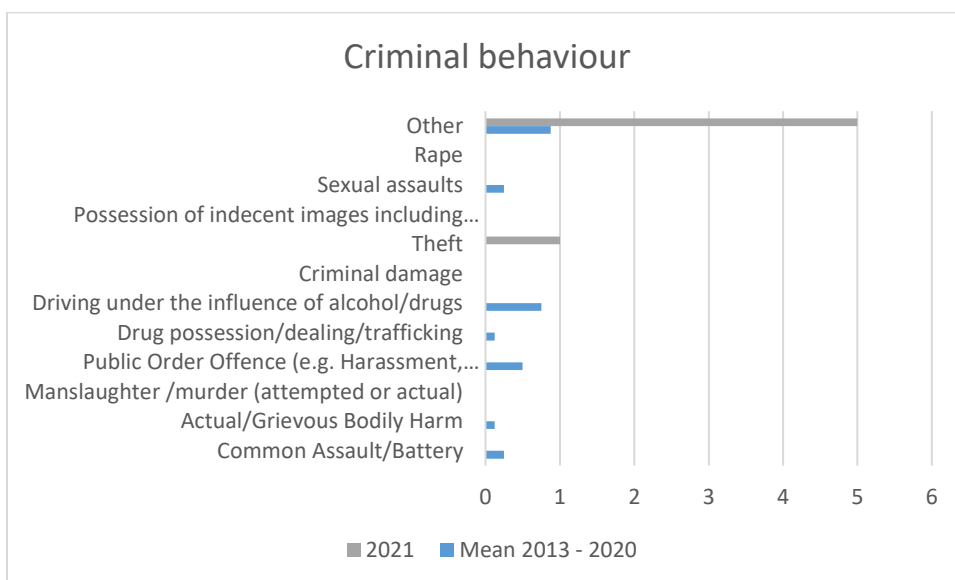


Figure 10. Criminal convictions and police cautions

Regulation specific

Most concerns raised about conduct relate to bringing the profession into disrepute. In 2020 and 2021 there were 17 and 13 concerns raised respectively. In previous years the average number was

6 concerns. These concerns were mainly about professional behaviour with regards to conduct on social media which included; spreading fake medical information about COVID, posting views on the COVID pandemic in a way that could bring the profession into disrepute and postings in online forums that included racial abuse, mocking people's mental health, and breaching confidentiality.

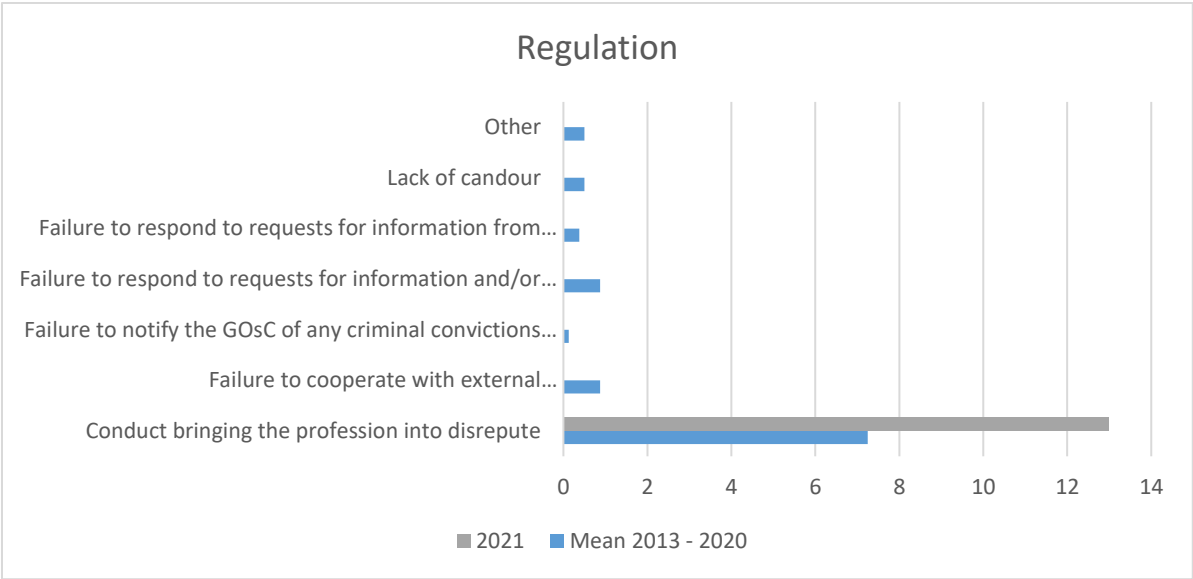


Figure 11. Regulation specific concerns and complaints

Implications for meeting Osteopathic Practice Standards (OPS)

In terms of the OPS, Safety and Quality is the area where we have seen the most concerns and complaints over the last nine years. Theme D, Professionalism includes ‘Bringing the profession into disrepute’ and ‘Respect and patient rights’, complaints in both these areas persist (Table 9 and Figure 12).

Table 9. Concerns and complaints mapped against the OPS

Osteopathic Practice Standards	2013	2014	2015	2016	2017	2018	2019	2020	2021
Theme A: Communication and Patient partnership	47	34	37	49	28	39	42	13	22
Theme B: Knowledge skills and experience	4	28	21	19	12	14	9	4	8
Theme C: Safety and Quality	91	138	116	128	95	67	70	23	63
Theme D: Professionalism	46	56	42	38	39	58	81	48	37

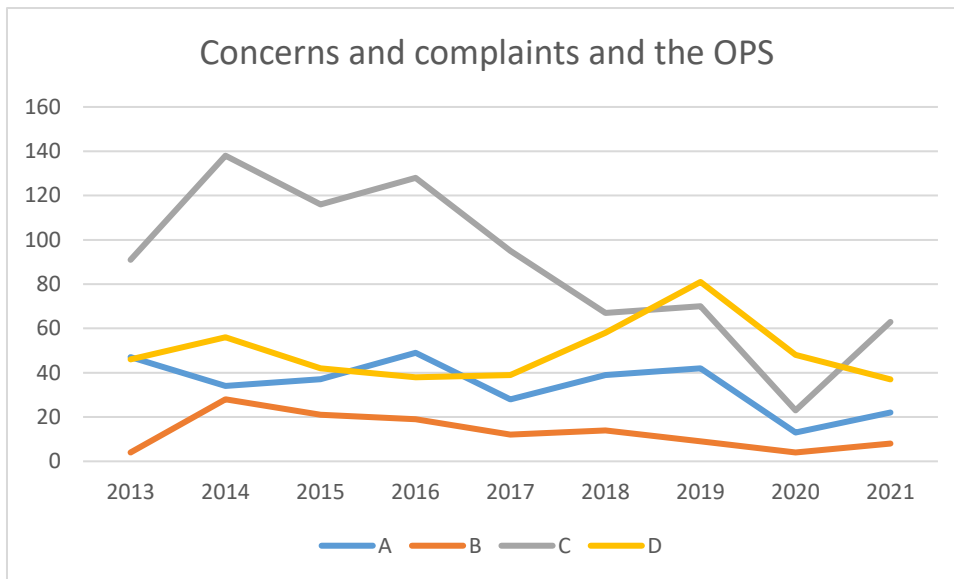


Figure 12. Number of concerns and complaints by OPS categories 2013 -2021

- A: Communication and patient partnership
- B: Knowledge skills and experience
- C: Safety and Quality
- D: Professionalism

Discussion and Conclusions

Summary of key findings

The number of concerns and complaints recorded for 2021 was higher than 2020 which was artificially low because of the COVID19 pandemic and subsequent clinic closures and lockdowns. During 2020 the pandemic did have an impact on the concerns about the health of the osteopath to deliver treatment, controlling the spread of communicable disease, unclean/ unsafe premises possibly indicating a heightened patient acknowledgement about the importance of these during 2020 but this 'trend' has not persisted in the figures seen for 2021 (n=2).

We were pleased to see that there were no concerns or complaints made about consent compared to a high of 20 complaints made in 2013.

Communication, however, remains a frequent concern. A total of 22 complaints were recorded in 2021 about communicating inappropriately and/ or ineffectively. This compares with a high of 49 complaints in 2016 (communicating inappropriately and failure to communicate effectively 8-year mean: 36).

The concerns about 'Bringing the profession into disrepute' remain above average in 2021 (n =13, the same as in 2020), these complaints were mainly centred on the COVID pandemic and related only to a few individuals. The social media posts were complained of by members of the public as well as other osteopaths in that the posts did not conform with government guidelines at the time and therefore brought the reputation of the profession into disrepute.

The data for 2021 show 12 complaints about sexual impropriety and having relations with a patient compared to highs of 19 in 2014, 2015, 2019 and 2020. Further analysis revealed that 10 of the

osteopaths were male and 2 were female. Of these, 9 were under 50 years old and 2 were over 50. 8 of the osteopaths had more than 10 years' experience, and 3 under 10 years (1 missing data). The types of complaints recorded related to; sexual relationships with patients, inappropriate touching and comments made of a sexual nature made towards a patient, rubbing genitalia against the patient whilst providing treatment and sending inappropriate texts to patients that were sexual in nature.

Future research

More detailed analysis will be now possible as we have 3 years of data that includes characteristics of those complained about associated with each the complaint. The dataset is now large enough to look for trends and associations between the characteristics of those complained about and the nature of the complaints about them. This more detailed analysis will enable us to determine any statistical associations enabling us to be more certain about our findings.

A review of the nature of complaints may also give more insight into common complaints and how to avoid them.

In addition it would be useful to reflect on all of the concerns and complaints data against other changes that have taken place within the profession to evaluate their impact against the concerns and complaints data. For example the education and training initiatives focussing on consent from 2012 to 2018, the implementation of the new GOsC CPD scheme and other regulation and professional initiatives. Further activities including ongoing and future work relating to touch and boundaries could impact on the number and nature of concerns and complaints.

This research could be valuable in determining the effect and impact of regulator on practice and be developed in to a CPD training course.

Conclusions

This data continues to allow us to evaluate practice from a mainly patient perspective which gives us a unique insight into the care delivered by osteopaths. Overall the number of concerns and complaints are low as are the numbers of osteopaths who have concerns and complaints raised about them. Disseminating this work to educators and the wider profession has the potential to focus clinical and professional training at pre- and post-registration levels.

Appendix 1

Clinical Care Issues (relating to quality and safety of clinical and osteopathic care provided)

Table A1. Quality of clinical practices (Clinical standards of behaviour)

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Inadequate case history	2	2	2	4	3	1	0	0	1
Inadequate examination, insufficient clinical tests	2	3	4	8	7	3	3	1	2
No diagnosis/inadequate diagnosis	10	6	4	4	9	4	4	3	11
No treatment plan/inadequate treatment plan	1	5	3	4	4	0	4	1	1
Termination of Osteopath/Patient relationship	2	2	1	2	0	3	2	1	1
Breach of patient confidentiality	3	4	0	0	3	4	3	0	0
Health of osteopath (to deliver care)			1	3	6	2	3	4	3
Totals	20	22	15	25	32	17	19	10	19

Mean total number of complaints 2013-2020: 20 (range 10-32)

Table A2. Safety of clinical practice (Errors, incidents, and staff competencies)

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Failure to act on/report safeguarding concerns	0	1	0	0	0	0	0	1	0
Failure to refer	5	4	2	3	4	0	2	0	9
Inappropriate treatment or treatment not justified	15	27	18	29	16	6	15	3	10
Forceful treatment	4	14	9	15	5	12	8	2	4
Treatment administered incompetently	1	22	11	10	3	1	4	2	7

Providing advice, treatment or care that is beyond the competence of the osteopath	0	3	6	2	1	5	2	1	0
Treatment causes new or increased pain or injury	34	42	42	40	34	29	20	11	25
Failure to maintain adequate records	4	2	1	4	2	1	0	3	0
Totals	63	115	89	103	65	54	51	23	55

Mean total number of complaints 2013-2020: 70 (range 23-115)

Management Issues (relating to the environment and organisation within which healthcare is provided (e.g. administrative, technical, facilities and management of staff))

Table A3. Environment (Problems in the facilities, services, clinical equipment, and staffing levels)

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Unclean/unsafe practice premises	0	1	1	0	1	0	0	0	1
Not controlling the spread of communicable diseases	0	0	1	0	0	0	0	6	1
Non-compliance with health and safety laws/regulations	0	1	0	0	2	0	0	0	0
Value for money	7	7	5	3	2	2	8	3	3
Totals	7	9	7	3	5	2	8	9	5

Mean total number of complaints 2013-20120: 6 (range 2-9)

Table A4. Business /Processes (Problems in bureaucracy, waiting times, and accessing care)

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Data Protection - management/storage/access of confidentiality data	4	3	2	2	2	6	6	2	2
Failure to maintain professional indemnity insurance	0	2	6	11	4	12	7	2	6
Dishonesty/lack of integrity in financial and commercial dealings	1	2	5	4	1	1	2	2	0
Dishonesty/lack of integrity in research	0	1	0	0	0	0	0	0	0
Fraudulent act(s) - e.g. Insurance fraud	4	1	3	4	0	0	4	1	0
Forgery - providing false information in reports	2	1	1	0	0	0	0	0	0
Forgery - providing false information in research	0	0	0	0	0	0	0	0	0
Forgery - providing false information in patient records	0	0	1	1	0	1	1	0	0
False/misleading advertising*	(3)	(9)	(156)	(177)	(80)	(4)	(5)	(8)	(1)
Disparaging comments about colleagues	2	3	1	1	4	3	0	0	0
Business dispute between Principal and Associate osteopaths	2	0	0	0	0	2	1	1	1
Business dispute between osteopaths	5	14	1	0	1	1	1	0	0
Business dispute between osteopath and other	5	1	1	0	0	0	0	0	1
Totals	25	28	21	23	12	26	22	16	9

*excluded

Mean total number of complaints 2013-2020 (excluding false misleading advertising): 22 (range 12-28)

Relations Issues (relating to the behaviour towards the patient or their family/friends)

Table A5. Listening and Communication (Disregard or do not acknowledge information from patients. Absent or incorrect communication to patients)

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Failure to communicate effectively	12	15	17	18	5	15	20	8	7
Communicating inappropriately	15	5	12	18	14	15	14	3	15
Failure to obtain valid consent - no shared decision making with the patient	20	14	8	13	9	9	8	2	0
Totals	47	34	37	49	28	39	42	13	22

Mean total number of complaints 2013-2020: 36 (range 13-49)

Table A6. Respect and Patient rights (Disrespect or violations of patient rights)

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Failure to treat the patient considerately/ politely	3	3	4	7	8	8	3	1	1
Conducting a personal relationship with a patient	5	6	5	4	2	3	2	5	0
Sexual impropriety	12	13	14	7	11	12	17	14	12
Failure to protect the patient's dignity/modesty	10	6	11	5	6	4	7	0	1
Failure to comply with equality and anti-discrimination laws	0	0	4	1	0	0	0	0	0
No chaperone offered/provided	3	1	3	0	1	1	1	0	0
Exploiting patients (borrowing money, encouraging large gifts, inappropriate fees, pressuring patients to obtain services for financial gain)	1	2	1	2	0	0	2	0	1

Totals	34	31	42	26	28	28	32	20	1
---------------	----	----	----	----	----	----	----	----	---

Mean total number of complaints 2013-2020: 30 (range 20 – 42)

Table A7. Adjuvant therapies / professions

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Psychological therapies and approaches (e.g. NLP, Mindfulness, CBT, Counselling)							0	0	0
Supplements (including homeopathy, herbs, vitamins etc)							0	0	0
Acupuncture/ Dry needling	2	3	1	1	2	1	2	3	3
Spiritual / Faith based therapies (including placebo)							0	0	0
Activity / movement related (e.g. yoga, Pilates, gait, analyses, podiatry (insoles)							0	0	0
Nutritional / Applied kinesiology	0	0	0	1	0	0	0	0	0
Separate non-clinical profession (e.g. Teaching, Building, Sales, Research)							0	0	0
Total	2	3	1	2	2	1	2	3	3

Mean total number of complaints 2013-2020: 2 (range 1-3)

Table A8. Criminal convictions and Police Cautions

	2013	2014	2015	2016	2017	2018	2019	2020	2021
Common Assault/Battery	0	1	0	0	0	0	1	0	0
Actual/Grievous Bodily Harm	0	1	0	0	0	0	0	0	0
Manslaughter /murder (attempted or actual)	0	0	0	0	0	0	0	0	0
Public Order Offence (e.g. Harassment, Riot, Drunken and disorderly, and racially aggravated offences)	1	1	0	1	0	0	1	0	0
Drug possession/dealing/trafficking	0	1	0	0	0	0	0	0	0
Driving under the influence of alcohol/drugs	1	1	1	0	2	0	0	1	0
Criminal damage			0	0	0	0	0	0	0
Theft			0	0	0	0	0	0	1
Possession of indecent images including child pornography	0	0	0	0	0	0	0	0	0
Sexual assaults	1	1	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Other			0	0	0	2	2	3	5
Total	3	6	1	1	2	2	4	4	6

Mean total number of complaints 2013-2020: 3 (range 1-6)

Table A9. Regulation Specific

	2015	2016	2017	2018	2019	2020	2021
Conduct bringing the profession into disrepute	0	1	13	9	22	13	13
Failure to cooperate with external investigations/engage in the fitness to practise process	0	0	1	1	5	0	0
Failure to notify the GOsC of any criminal convictions or police cautions	0	0	0	0	1	0	0
Failure to respond to requests for information and/or complaints from a patient	0	0	1	3	3	0	0
Failure to respond to requests for information from the GOsC	0	0	1	0	2	0	0
Lack of candour	0	0	1	2	1	0	0
Other						4	0
Total	0	1	17	15	34	17	13

Mean total number of complaints 2013-2020: 14 (range 0-34)

Appendix 2

Concerns and complaints mapped onto osteopathic practice standards

Theme A – Communication and patient partnership

Listening and communication

- Failure to communicate effectively,
- Communicating inappropriately,
- Failure to obtain valid consent-no shared decision-making with patient

Theme B – Knowledge, skills and performance

Safety of clinical practice (errors/ incompetence)

- Treatment administered incompetently
- Failure to treat patient considerably/politely
- Providing advice, treatment or care that is beyond the competence of osteopathy

Theme C- Safety and quality

Quality clinical practice (standards of healthcare)

- No treatment plan/inadequate treatment plan
- No diagnosis/inadequate diagnosis
- Inadequate examination/insufficient clinical tests

Safety of clinical practice (errors/ incompetence)

- Inappropriate treatment or treatment not justified
- Treatment causes new or increased pain or injury
- Forceful treatment
- Failure to refer
- Failure to maintain patient records

Respect and patient's Rights

- Failure to protect patient's dignity/modesty
- No chaperone offered/provided

Theme D - Professionalism

Quality clinical practice (standards of healthcare)

- Breach of patient confidentiality

Business/processes

- Failure to maintain professional indemnity insurance
- Data protection-management/storage/ access of confidentiality data
- False/misleading advertising
- Fraudulent acts e.g. Insurance fraud
- Business dispute between osteopaths

- Dishonesty/lack of integrity in financial and commercial dealings
- Forgery - providing false information in patient records

Respect and patient's Rights

- Sexual impropriety
- Conduct a personal relationship with the patient
- Exploiting patients (borrowing money, encouraging large gifts, inappropriate fees, pressuring patients to obtain services for financial gain)

Criminal convictions

- Common Assault/Battery
- Public Order Offence (e.g. harassment, riot, drunken and disorderly, and racially aggravated offences)

Regulation Specific

- Conduct bringing the profession into disrepute
- Lack of candour
- Failure to respond to requests for information and/or complaints from patients
- Failure to cooperate with external investigations/engage in fitness to practice process
- Failure to notify the GOsC of any criminal convictions or police cautions

References

General Osteopathic Council. Osteopathic Practice Standards

<https://standards.osteopathy.org.uk/>