



**Policy Advisory Committee**

**4 March 2020**

**Fitness to Practise: Adjunctive Therapies**

<b>Classification</b>	Public
<b>Purpose</b>	For discussion
<b>Issue</b>	Protecting patients and supporting other stakeholders in understanding the application of the Osteopathic Practice Standards to the breadth of practice undertaken by osteopaths.
<b>Recommendations</b>	<ol style="list-style-type: none"><li>1. To consider the draft guidance note for osteopaths on issues arising about the application of the Osteopathic Practice Standards to adjunctive therapies.</li><li>2. To note plans for a roundtable event incorporating input from patients, other regulators, PCC panel members and the iO.</li></ol>
<b>Financial and resourcing implications</b>	Consultation and engagement costs are included in our 2020/21 budget.
<b>Equality and diversity implications</b>	Equality and diversity issues are a key component of this work and will form part of an equality impact assessment.
<b>Communications implications</b>	This work is in early development with stakeholders. It will be communicated further when it is further developed.
<b>Annex</b>	Annex - Draft guidance note for osteopaths: 'The Osteopathic Practice Standards and their relationship to the breadth of osteopathic practice, adjunctive therapies and other forms of care and treatment provided by osteopaths'
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## Background

1. Our Business Plan 2019-20 states that we will: 'Explore the need for guidance or resources to support osteopaths engaged in adjunctive / complementary therapies and other stakeholders to understand the application of the Osteopathic Practice Standards.' This activity is continued in the 2020-21 Business Plan which was approved by Council in January 2020.
2. In spring 2019 the professional standards and regulation teams hosted a seminar with osteopaths, lay people with experience of fitness to practise processes and patients to explore some of the issues relating to the application of the Osteopathic Practice Standards in the context of adjunctive therapies.
3. Following this, we developed a number of fictional case examples illustrating the breadth of the challenges experienced by patients and osteopaths.
4. At its meeting in October 2019 the Policy Advisory Committee considered a paper which highlighted the work that we had done to explore and scope the issues at hand and proposed an approach for taking work on these issues forward. The Committee noted that integrated care is not unusual for osteopaths and acknowledged the complexity of the issues. The Committee advised that there should be no disaggregation of care and that professionalism is required from osteopaths at all times.
5. The purpose of this paper is to seek feedback in an early draft of a guidance note to support osteopaths in understanding the application of the Osteopathic Practice Standards to all areas of their practice, including adjunctive therapies. The paper also provides an update on plans to engage with stakeholders about the issues outlined in the guidance note.

## Discussion

6. The fictional case examples that were shared with the Committee at its last meeting raised the following questions relating to treatment using adjunctive therapies:
  - a. What are 'osteopathic techniques'?
  - b. What is 'integrated'/'adjunctive care'?
  - c. In what circumstances should the Osteopathic Practice Standards apply<sup>1</sup>, and why?
  - d. Might it depend, for example,
    - on the particular care or treatments offered and the associated dialogue with the patient?
    - or whether the patient is protected because that professional is regulated by another regulator for the adjunctive therapy?

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<sup>1</sup> If not 'practising as an osteopath' are there any circumstances when the Osteopathic Practice Standards will not apply?

- or whether the treatment or act is such that no osteopath or other health professional would undertake it?
  - e. When do issues of integrity and honesty arise?
  - f. Is registration as an osteopath traded on by registrants practising adjunctive therapies?
  - g. Does it matter if the adjunctive therapy is typically practised by an osteopath or not?
  - h. Might the response be the same if the person responding is the osteopath, another osteopath, another health professional or the patient or a member of the public?
  - i. What is the role of patient consent when novel techniques are offered?
7. The guidance note at the Annex, uses the fictional case examples to explore the issues that arise for osteopaths and patients when applying the Osteopathic Practice Standards in different contexts.
  8. The guidance acknowledges the diversity of treatment approaches within the profession and clarifies the requirement for a patient-centred approach and adherence to the Osteopathic Practice Standards across all aspects of an osteopath's practice. It recognises that applying the standards of professionalism to all areas of an osteopath's practice presents few difficulties but notes that there are potential challenges in understanding how to apply some of the other standards. The guidance explores how the standards might be applied in the following circumstances:
    - a. Where an osteopath is also a member of another regulated profession and therefore subject to a different set of standards in addition to the Osteopathic Practice Standards
    - b. Where the osteopath provides professional services other than osteopathy, either within or outside the healthcare context.
    - c. Where an osteopath seeks consent from a patient for a novel form of care or treatment.
  9. The purpose of this draft document is to provide a starting point for further exploratory discussion with stakeholders about the application of the Osteopathic Practice Standards to adjunctive therapies and other areas of osteopaths' practice.

### **Next steps**

10. The professional standards and regulation teams will organise a roundtable discussion with stakeholders on the issues illustrated by the fictional case examples and explored in the draft guidance. Engagement will be sought from a range of stakeholders including: healthcare regulators that regulate professions with similarly diverse approaches to practice; patient representatives; osteopathic members of the fitness to practise committees; and the iO.

11. Council agreement will be sought to carry out a public consultation on the draft guidance following the roundtable event.

**Recommendations:**

1. To consider the draft guidance note for osteopaths on issues arising about the application of the Osteopathic Practice Standards to adjunctive therapies.
2. To note plans for a roundtable event incorporating input from patients, other regulators, PCC panel members and the iO.