



Policy and Education Committee

7 October 2021

National Council of Osteopathic Research Report: Types of concerns and complaints raised about osteopaths and osteopathic services in 2013 to 2020

Classification	Public
Purpose	For discussion
Issue	Consideration and reflection on the findings from the NCOR concerns and complaints report 2013 to 2020 to inform consideration by Council later in 2021/22 when the report has been finalised.
Recommendation	To consider the implications of the NCOR concerns and complaints report 2013-2020.
Financial and resourcing implications	The cost of compiling the report is £1,100 and is covered within the budgets approved annually by Council.
Equality and diversity implications	The report provides information related to equality, diversity and inclusion matters.
Communications implications	The report remains private at this stage whilst we reflect on the detailed findings and consider how we should respond in partnership with our stakeholders to protect patients.
Annex	(PRIVATE) Draft Report: Types of concerns and complaints raised about osteopaths and osteopathic services in 2013 to 2020
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Key messages from paper:

- Every year the National Council for Osteopathic Research (NCOR) produce a report on the type of concerns and complaints made against osteopaths and osteopathic services. The report for 2013-2020 is annexed to this paper.
- The report brings together concerns and complaint data from the General Osteopathic Council (GOsC), the Institute of Osteopathy (iO) and three insurers of osteopaths.
- The updated data collection took place during January to December 2020, and therefore there are some features attributed potentially to the coronavirus pandemic lockdown. Key findings include:
 - Reduced number of concerns overall
 - Reduced proportion of concerns relating to communication
 - Increased concerns related to covid 19 issues
 - Continued high levels of concerns related to sexual impropriety
 - Professionalism is the dominant theme in relation to concerns.
- We continue to use this report to ensure that we are continuing to focus on practise in accordance with the Osteopathic Practice Standards with particular communications and policy priorities covering the areas of concern outlined in the report.
- We are presenting this draft report to the Committee at this early stage to enable the Committee to share insights and reflections on current practice and our role in supporting practice to inform a more detailed paper to Council later in 2021.

Background

1. This cover paper is designed to highlight, at a very high level, key findings and our progress on these issues. However, there is further reflection to be undertaken, including discussion of the nuances and critical reflection on what we are doing in partnership with Professor Carnes and others, to see how we can enhance our policy and communications to deliver key messages and understand key challenges to implementing our Osteopathic Practice Standards in a way which protects patients.
2. The draft report is presented to enable the Committee to share their own insights and reflections on the findings with us. It is intended that a more detailed paper and the final report will be considered by Council towards the end of 2021.

Discussion

NCOR Report 2013-2020: key findings

3. The draft NCOR Report - which is annexed to this paper as a private draft at this stage - sets out a number of key findings. These are provided below for ease of reference:

- 'Significant reduction in complaints and concerns' (likely due to reduction in practice) '(103 osteopaths compared to 7 year mean of 153) and 115 concerns compared to 7 year mean of 274 (including false / misleading concerns)'
- Osteopaths with less than two years in practice were least likely to be complained about. Osteopaths with between 3-5 years of experience are proportionately more likely to receive a complaint against them (2.5% in 2019 and 2.2% in 2020). 'But these figures are very low and have a small range (1.5 – 2.2%).
- 'Notable areas of concerns and complaints related to COVID -19 were:
 - i. Complaints about 'conduct bringing the profession into disrepute' (7 year mean 6, 2020= 13).
 - ii. 'Not controlling the spread of communicable diseases' (7 year mean <1, 2020 = 6)
 - iii. 'Health of the osteopath to deliver care (7 year mean 2, 2020 = 4).'
- 'Persisting areas of complaints were those relating to 'sexual impropriety' (7 year mean 12, 2020 =14,) and 'conducting a personal relationship with a patient' (7 year mean 4, 2020 = 5).'
- 'Above average complaints were received about the environment, adjuvant therapies, criminal convictions and regulation specific issues, but all were in previous ranges recorded.'
- Failure to communicate effectively has the second highest number of concerns and complaints but is well below the average for the previous years.
- 'When the concerns and complaints are mapped against the Osteopathic Practice Standards (OPS) we can see that 'Professionalism' remains the area of most concerns'
- Concerns about advertising remain persistent

4. The concluding observations of the report are particularly interesting:

'The most notable area where complaints are above the combination of years' average, despite the huge reduction in the number of reported complaints, are seen in regulation specific complaints (n=17 mean= 6). Looking at these data in

more detail we can see that these complaints centre around 'conduct bringing the profession into disrepute', with many relating to COVID-19 and inappropriate, misleading information. Interestingly some of these have been from the use of social media. It may be useful to consider a social media awareness campaign to reflect on the inappropriate use and implications of using different forms of social media and the appraisal of information to assess its provenance, credibility and quality.

Other areas showing higher than average complaints that are related to COVID 19 are: 'Not controlling the spread of communicable diseases' (mean <1, 2020 = 6) and the 'health of the osteopath to deliver care' (mean 2, 2020 = 4). The issue of infection control has been highlighted during the pandemic and education in this area will remain a priority.

A persisting area of complaints is that relating to 'sexual impropriety' (n=14) and 'conducting a personal relationship with a patient' (n= 5) both were more than the 7 year means by 2 and 1 more complaints respectively.

When the concerns and complaints are mapped against the OPS we can see that 'Professionalism' remains the area of most concerns.

Conclusions

The pandemic highlighted issues surrounding infection prevention and control and some of the pitfalls surrounding the voicing of personal views on social media acknowledging the impact it may have on colleagues and the profession. The best interest of patients must be considered in all aspects of care and delivery and the data show that there is still room for improvement in professionalism, respecting patient rights, quality and standards of clinical practices and the environment (hygiene, infection prevention and control).'

5. The key headlines in the report are areas that we have been working on across the last year. However, further work is indicated to continue to reduce these concerns and protect patients. For example

Theme	Actions	Next steps
Persisting prevalence of concerns about sexual impropriety and boundaries	We have a cross departmental project team working on a boundaries project across 2021 and 2022 aiming to increase knowledge and skills of osteopaths in this area, to help osteopaths to understand 'professional behavioural norms' and also helping osteopaths to understand different perspectives on breaches of boundaries. Examples of the types of activity proposed and underway	We are continuing to explore opportunities to raise awareness of the impacts of boundaries.

Theme	Actions	Next steps
	<p>(including others in the sector) include:</p> <ul style="list-style-type: none"> - CPD Boundaries scenarios and responses including blogs - Research updating the Thematic review of boundaries in undergraduate and pre-registration process being commissioned - Talking heads – blogs planned from different members of the profession discussing issues arising and approaches to them - Patient perspectives on boundary issues - Focus on boundaries and professionalism in student presentations 	
High prevalence of concerns related to bringing the profession into disrepute	<p>Many of these concerns are focussing on COVID 18 and misinformation.</p> <p>We have issued updated Guidance about Infection Control, public health guidance, public health expectations of osteopaths as outlined in the Osteopathic Practice Standards.</p>	<p>The report recommends a further focus on social media use and a continued and ongoing focus on infection control.</p> <p>We will consider how best to continue to develop and refine our ongoing communications in this area to increase impact.</p>
Professionalism	<p>It is notable that concerns continue to be more prevalent in the area of professionalism and also pleasing the proportion of concerns in communication and consent appears to have reduced.</p> <p>We continue to promote resources in relation to communication and consent and professionalism.</p> <p>Our boundaries scenarios, focus on infection control and planned guidance on the consultation about adjunctive</p>	<p>Further work may be required to consider how we might better embed wider aspects of professionalism into our policy development and communications.</p>

Theme	Actions	Next steps
	therapies may support enhancing knowledge and skills in this area.	
Advertising	We have partnered with the ASA this year to release a joint statement and promote a blog from the ASA linking advertising to trust in the profession. We will continue to work on reducing those concerns.	

6. We will continue to work in partnership with Professor Carnes and other stakeholders including osteopaths and patients as the report is finalised to yield further insights and suggestions about how we might reduce concerns and continue to protect patients.
7. It is worth reflecting on the impact this report has had on our regulatory work since its development and implementation by Professor Carnes and the GOsC team in 2013. It was the first project of its kind in the regulatory landscape to collect data about concerns beyond that held just by the regulator, and has been instrumental in informing the development of our CPD scheme and other policies and communications to drive up standards. It is significant that concerns have continued to reduce over the period since the data has been collected. It is suggested that this is because the report enables us to tackle areas of concern at an earlier stage due to this intelligence. However, we are not complacent, as it is imperative on us to continue to target effective regulatory responses to the findings which require feedback from osteopaths and patients and continual consideration of context to continue to have impact and to protect patients.

Next steps

8. Feedback from the Committee is welcomed both on the report's findings and responses to it, including how GOsC should respond to the findings. The report will be considered further by Council ahead of publication.

Recommendation: To consider the implications of the NCOR concerns and complaints report 2013-2020.