

National Council for



Osteopathic Research

Types of concerns and complaints raised about
osteopaths and osteopathic services in 2013 to 2023

Summary

Osteopathic practices report being very busy since recovery from the effects of the 2020/2021 Covid pandemic. The effects of the pandemic have impacted NHS services significantly and patients are experiencing extended waiting times for access to primary care and secondary care services (NHS England, 2023)¹. The regular Census conducted by the Institute of Osteopathy reported in 2024 that in the period March to June, 2024 “nearly a third of practices reported having recruited additional clinical staff over the last six months and a similar number suggesting that they intend to do so over the next six months” (iOCensus, 2024)².

Data relating to concerns and consent have now been collected since 2013. The data collection template has undergone various iterations since this process began ensuring data were collected in a manner consistent with other organisations. A notable omission from the data was any information about the patients or other individuals raising the concern or complaint. This type of data would provide a valuable source of information to inform clinicians if there were any consistent trends in data that could be addressed through continuing professional development (CPD) to avoid concerns and complaints being raised in relation to certain symptoms reported, age, gender or ethnic groups for example. To address this omission, a new data collection template has been developed and used for the first time this year.

When reviewing data for 2023, osteopaths had complaints made against them compared to 103 in 2022. There were 121 concerns and complaints raised in 2023. There were no complaints this year concerning false/misleading advertising complaints. This is the second lowest number of complaints made with 2020 still being the lowest at 115 complaints.

Most complaints were reported about male osteopaths (66.7%). The age groups most strongly and equally represented (23.1%) in complaints were 31-40 and 41-50 with male osteopaths represented more frequently in each age band. However, the data have to be placed in context with the number of osteopaths per age band and the number of complaints recorded in each age band. For the age group 61-70, more complaints were raised in this age group as a percentage of the osteopaths among the profession as a whole. When examining years since qualification, the data show that osteopaths who have been

qualified/graduated for 10 or more years have an increased number of complaints raised about them compared to those graduated prior to 10 years ago (63.4% vs 35.9%).

Notable areas of complaint during 2023 were:

- Forceful treatment n=5
- Treatment causes new or increased pain or injury n=25
- Failure to communicate effectively n=7
- Communicating inappropriately n=7
- Sexual impropriety n=15

When the concerns and complaints were mapped against the Osteopathic Practice Standards (OPS) we can see that 'Quality and Safety' and 'Professionalism' remain the areas of most concern echoing the data from 2023.

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Introduction

Concerns and complaints made by patients, members of the public, health care sector workers and health care professionals about health care practitioners are crucial to understand in order to identify, and prevent future issues associated with poor clinical practice and patient management. 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) to classify concerns and complaints (Reader *et al.*, 2014)³. 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 2023 to December 31st 2023. 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 once contributions have been received from stakeholders including patients, members of the public, health care sector workers and health care professionals informing the contributing organisations of a concern or complaint they would like to report. This can be contributed by telephone, email or letter. Concerns and complaints that are escalated to the regulator are only reported by the GOsC to limit duplication. Data were collected from each contributing organisation using 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 specified 12-month period. Summary analysed data are provided and then more detailed analysed data by subcategories are given. Summary raw data are contained in Appendix 1. Subcategories have been mapped against the Osteopathic Practice Standards which can be found in Appendix 2.

In previous years data have not been collected and analysed about those making the complaints. Increasingly this appeared to be an important omission. Understanding more about the people raising complaints and trying to identify any trends could help to inform relevant continuing professional development activities for the profession thereby avoiding future sources of concern or complaint.

Part 1: Profile of osteopaths about whom complaints were made

Complaints were raised about 117 osteopaths during 2023.

Among the osteopaths complained about 36 (30.7%) were female and 78 (66.7%) male, representing 2.1% of all registered osteopaths. Missing data was present (n=3).

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 complaints) (% of registered males)	Females (% of total complaints) (% of registered females)	Missing data
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	113 (2.1%)	78 (69%)	35 (31%)	

Males 2,684 Females 2,773		(2.9%)	(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%)	
2022* Total 5437 Males: 2629 Females: 2808	103 (1.9%)	66 (64%) (2.5%)	37 (36%) (1.3%)	
2023 Total 5331 Males: 2666 Females: 2865	117 (2.1%)	78 66.7% 2.9%	36 30.7% 1.3%	3 (2.6%)

*This figure includes registrants on the GOsC database up to end of March, 2023.

Osteopaths practise in diverse areas nationally and internationally. Most of the osteopaths about whom complaints are made practise in England, but this reflects the larger number of osteopaths based in England. The distribution of osteopaths and complaints is described in Table 2.

Table 2 Location of osteopaths about whom complaints were made

Country	Number of osteopaths about whom complaints were made about in 2023	Percentage of osteopaths in each geographical area
England	109	2.3%
Northern Ireland	1	3.2%
Scotland	2	1.2%
Wales	4	2.4%
Other (non-UK)/overseas	0	0%
Missing data	1	0.02%

Gender and age

The age of osteopaths about whom complaints are made is shown in Table 3.

Table 3. Age of osteopaths about whom complaints are made

Age band	Number of osteopaths on GOsC register in 2023	Percentage of osteopaths on GOsC register in 2023	Number of osteopaths about whom complaints are made per age band	Percentage of osteopaths about whom complaints were made in 2023 per age band
Up to 30	752	13.6%	11	9.4%
31-40	1189	21.5%	27	23.1%
41-50	1415	25.7%	27	23.1%
51-60	1431	25.9%	21	17.9%
61-70	648	11.7%	20	17.1%
71 years and over (8 osteopaths are aged over 80)	96	1.7%	2	1.7%
Missing data	0	0%	9	7.7%

These data must be interpreted in terms of the number of osteopaths within each age band. Although the 31-40 and 41-50 age bands have the highest number of concerns and

complaints recorded against them, for the age group 61-70, more complaints were raised in this age group as a percentage of the osteopaths among the profession as a whole.

However, the data has to be placed in context with the number of osteopaths per age band and the number of complaints recorded in each age band. For the age group 61-70, more complaints were raised in this age group as a percentage of the osteopaths in this age band among the profession as a whole.

The gender of osteopaths about whom complaints are made is shown in Table 4.

Table 4. Gender of osteopaths about whom complaints were made in 2023

Gender	Number of osteopaths on GOsC register	Percentage of osteopaths on GOsC register	Number of osteopaths about whom complaints were made	Percentage of osteopaths about whom complaints are made per gender
Male	2666	48.3%	78	2.5%
Female	2865	51.7%	36	1.3%
Missing data	0	0%	3	0%

Figure 1 shows the age and gender distribution of osteopaths about whom complaints are made.

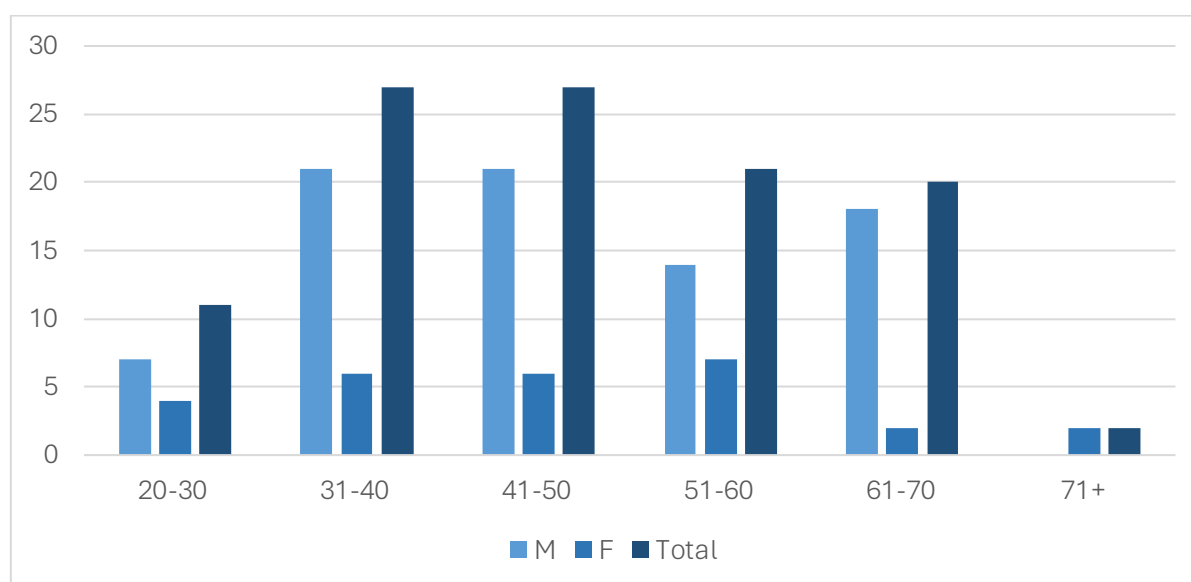


Figure 1. Age and gender distribution for osteopaths about whom complaints are made

Figure 1 shows that male osteopaths in the 31-40 age group and 41-50 age group had more complaints made against them than other groups. If the data are placed in context with the number of osteopaths per age band and the number of complaints recorded in each age band, in the age group 61-70, more complaints were raised against male osteopaths in this age group as a percentage of the osteopaths among the profession as a whole. More complaints have been made against male osteopaths, but we don't have data to place practice within the context of numbers of patients seen per week for example. However, the data has to be placed in context with the number of osteopaths per age band and the number of complaints recorded in each age band. For the age group 61-70, more complaints were raised in this age group as a percentage of the osteopaths in this age band among the profession as a whole.

Number of years post-qualification

Table 5 shows that osteopaths who have been qualified/graduated for 10 or more years have an increased number of complaints raised about them compared to those graduated prior to 10 years ago (63.4% vs 35.9%).

Table 5. Distribution of complaints and practitioners' years of practice

Characteristics	Number of osteopaths (% of total complained about by years' since graduation)							
	2016	2017	2018	2019	2020	2021	2022	2023
Years post-graduation								
0-2	3 (1%)	8 (4%)	0	7 (6%)	10 (10%)	13 (9%)	9 (8.7%)	13 (11.1%)
3-5	38 (19%)	23 (13%)	22 (17%)	18 (16%)	15 (15%)	19 (14%)	9 (8.7%)	9 (7.7%)
6-10	31 (15%)	37 (20%)	11 (9%)	15 (14%)	17 (16.5%)	22 (16%)	19 (18.4%)	20 (17.1%)
>10	130 (63%)	89 (48%)	85 (67%)	71 (45%)	48 (47%)	79* (57%)	63† (61.3%)	74‡ (63.4%)
Missing data	3 (1%)	27 (15%)	9 (1%)	2 (2%)	23 (22%)	5 (4%)	2 (2.9%)	1 (0.7%)
Total	205	184	127	113	103	138	103	117

*37/79 of osteopaths with >10 years' post-graduation experience had been qualified for 21 years or more.

†28/63 of osteopaths with >10 years' post-graduation experience had been qualified for 21 years or more.

‡38/74 of osteopaths with >10 years' post-graduation experience had been qualified for 21 years or more

These data are represented graphically in Figure 2.

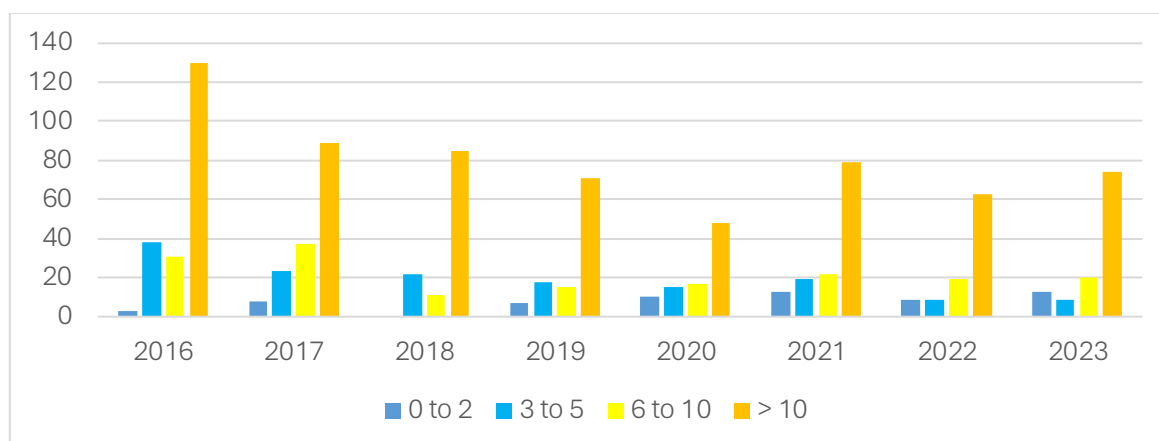


Figure 2. Distribution of complaints by years since graduation 2016 – 2023

Data were examined to identify the distribution of complaints when considering both gender and years since qualification. These are shown in Figures 3 and 3a.

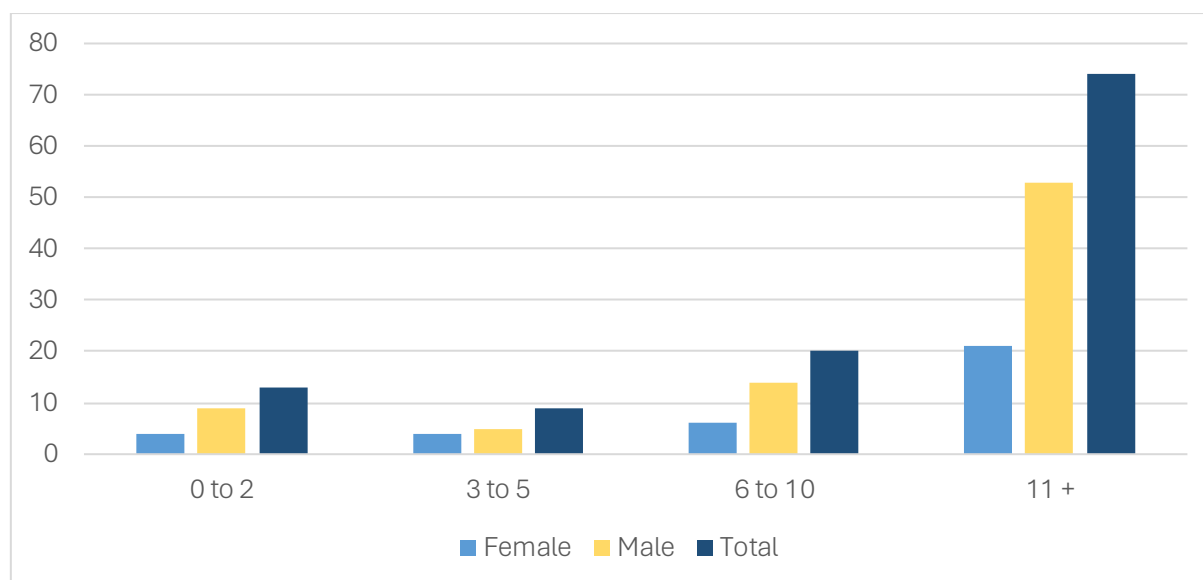


Figure 3. Numbers of males and females complained about by years of experience 2023 in summary

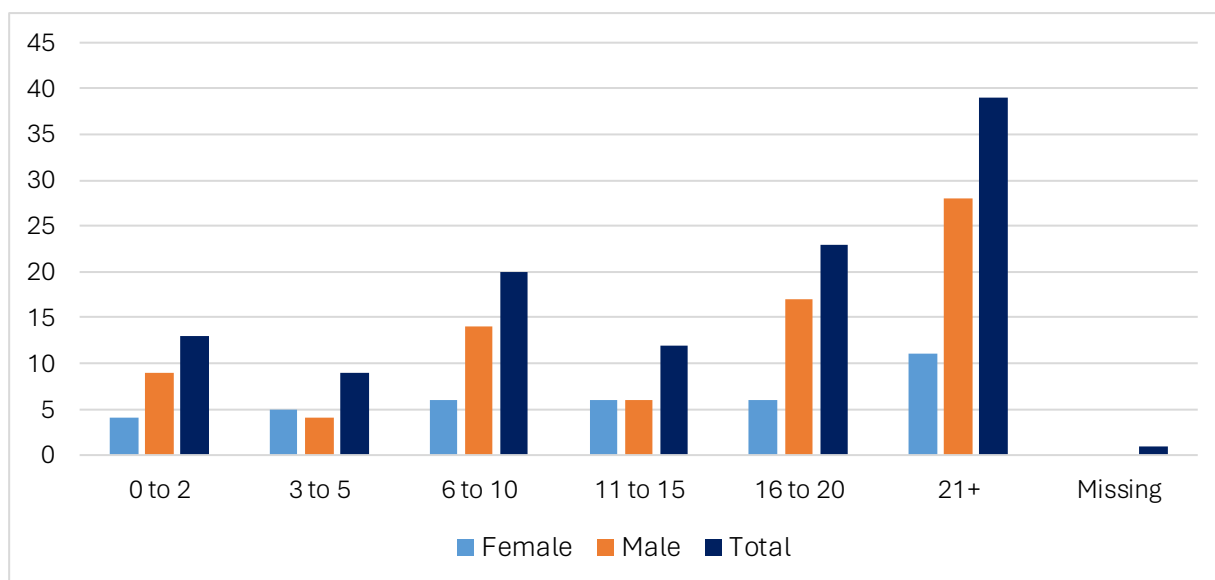


Figure 3a. Numbers of males and females complained about by years of experience 2023 in detail

Types of concerns and complaints

The number of concerns raised in 2023 was 121, a reduction from the previous year of 126. The figures from 2020 remain the lowest since these data have been recorded due to the practice closures and two national lockdowns during the Covid pandemic. During 2023 practices have returned to being busy as the lasting effects of the pandemic on services in the National Health Service (NHS) became more pronounced. Access to primary care appointments and accessing services for musculoskeletal problems in secondary care is still limited. The 117 complaints reported in 2023 are the second lowest number recorded in the past 10 years.

Concerns raised about clinical care issues (relating to quality and safety of clinical and osteopathic care provided) make up 49.6% of cases reducing slightly from 53.1% 2022. Relations issues (relating to the behaviour towards the patient or their family/friends) were the second most frequent cause of complaint at 29.8% representing an increase from 21.4% in 2022. More information is shown in Table 6.

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Clinical Care Issues (relating to quality and safety of clinical and osteopathic care provided)	83	137	104	128	97	71	70	33	74	67	60
Management Issues (relating to the environment and organisation within which healthcare is provided)	32	37	28	26	17	28	30	17	16	18	17
Relations Issues (relating to the behaviour towards the patient or their family/friends)	81	65	79	75	56	67	74	33	37	27	36
Adjuvant therapies / Professions	2	3	1	2	2	1	2	3	3	2	4
Criminal convictions / Police cautions	3	6	1	1	2	2	4	4	6	3	3
Regulation specific issues			0	1	17	15	34	17	13	7	1
Subtotal	200	248	213	233	191	184	214	107	149	124	121
False/misleading advertising*	3	9	156	177	80	4	5	8	1	2	0
Total	203	257	369	410	271	188	219	115	150	126	121

Figure 4. shows the data from Table 6 in a graphical form. There is a slight decrease in complaints relating to management issues for 2023 and there are no complaints relating to false/misleading advertising.

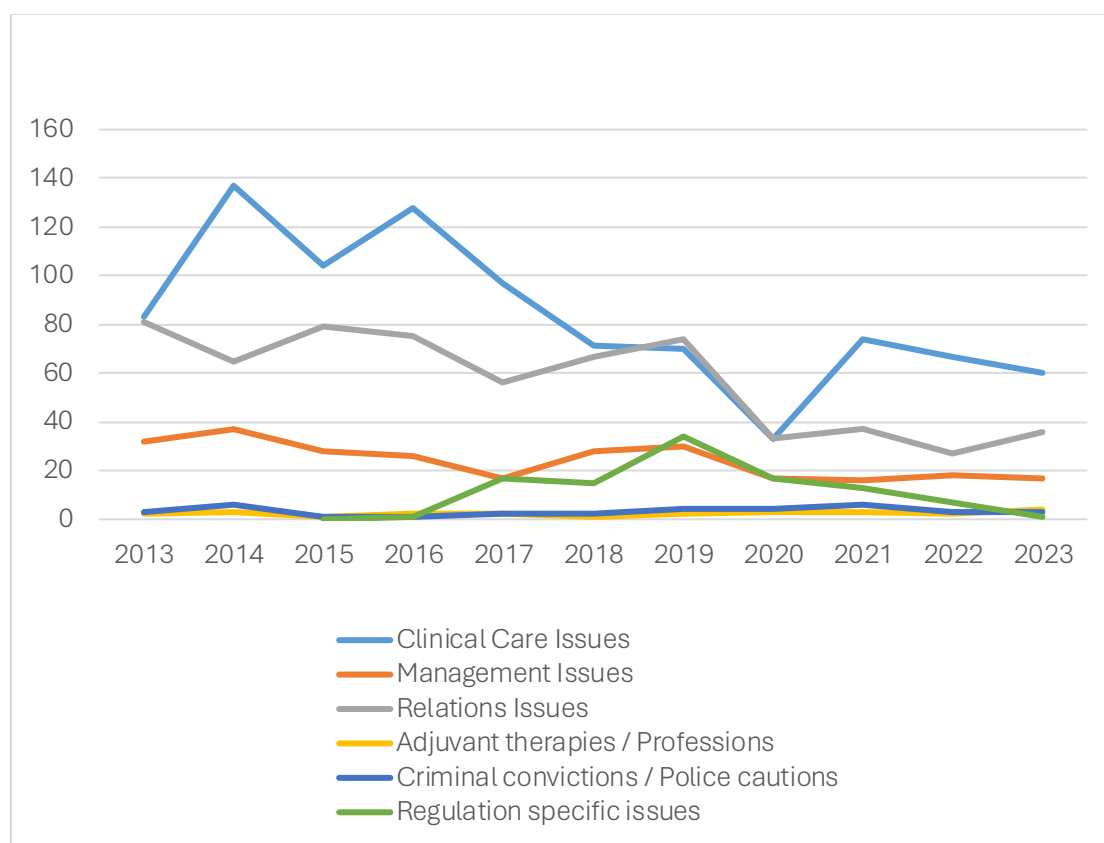


Figure 4. Overall numbers of concerns and complaints raised each year by theme

Table 7 shows the mean values of data from previous years and allows us to compare 2023 data with the average over the last 10 years for each theme and sub-theme. The data shows all figures are below the average with the exception of environment.

Table 7. Overall comparison with previous years

Theme	Mean 2013-2023 (range)	2023
Clinical Care Issues		
Quality of clinical practices	18.7 (range 10-32)	17
Safety of clinical practice	65.2 (range 23-115)	43
Management		
Environment	6.1 (range 2-9)	5
Business /Processes	18.8 (range 11-28)	12
Relationship Issues		
Listening and Communication	31.1 (range 13-49)	16
Respect and Patient rights	26.2 (range 12-42)	20
Adjuvant therapies / professions	2.1 (range 1-3)	4
Criminal convictions and Police Cautions	3.2 (range 1-6)	3
Regulation specific (2015-2022)	11.7 (range 0-34)	1

Table 8. Number of Concerns and complaints per year: 2013 to 2023

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
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	10	17
Safety of clinical practice (Errors, incidents, and staff competencies)	63	115	89	103	65	54	51	23	55	57	43
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	7	5
Business /Processes (Problems in bureaucracy, waiting times, and accessing care)	25	28	21	23	12	26	22	16	11	11	12
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	15	16
Respect and Patient rights (Disrespect or violations of patient rights)	34	31	42	26	28	28	32	20	15	12	20

Other											
Adjuvant therapies / Professions	2	3	1	2	2	1	2	3	3	2	4
Criminal convictions / Police cautions	3	6	1	1	2	2	4	4	6	3	3
Regulation specific issues			0	1	17	15	34	17	13	7	1
Subtotal	200	248	213	233	191	184	214	107	149	124	121
False/misleading advertising**	3	9	156	177	80	4	5	8	1	2	0
Total	203	257	369	410	271	188	219	115	150	126	121

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 about the lack or inadequacy of a treatment plan. Figure 5b shows high levels of complaints concerning new or increased pain, and delivery of forceful treatment consistent with previous data.

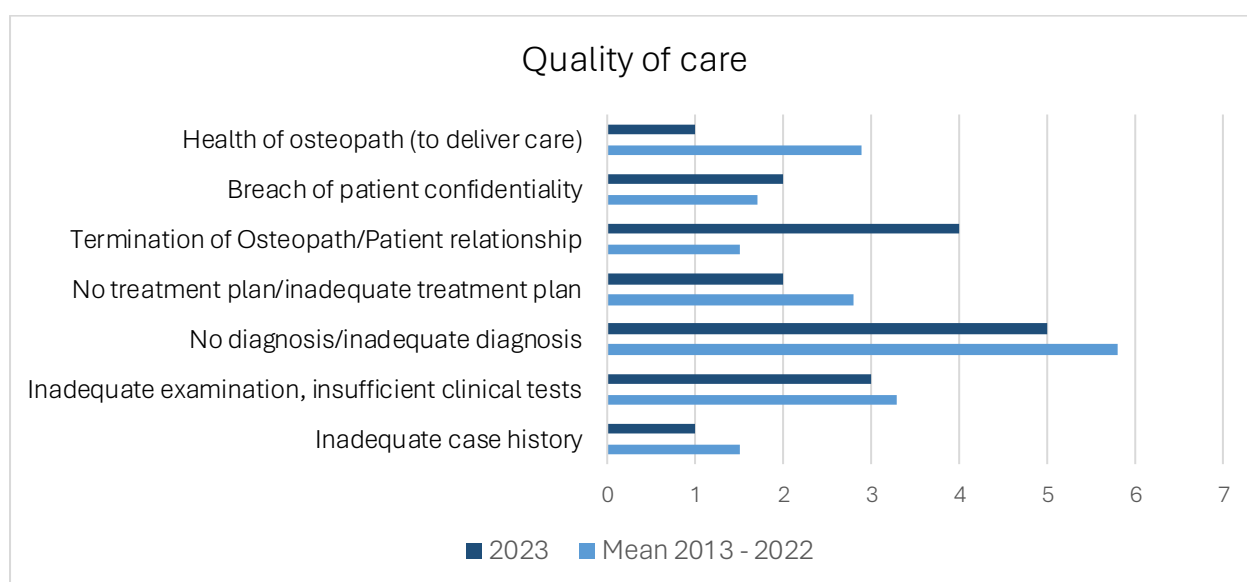


Figure 5a. Clinical Care Issues (relating to quality of clinical and osteopathic care provided).

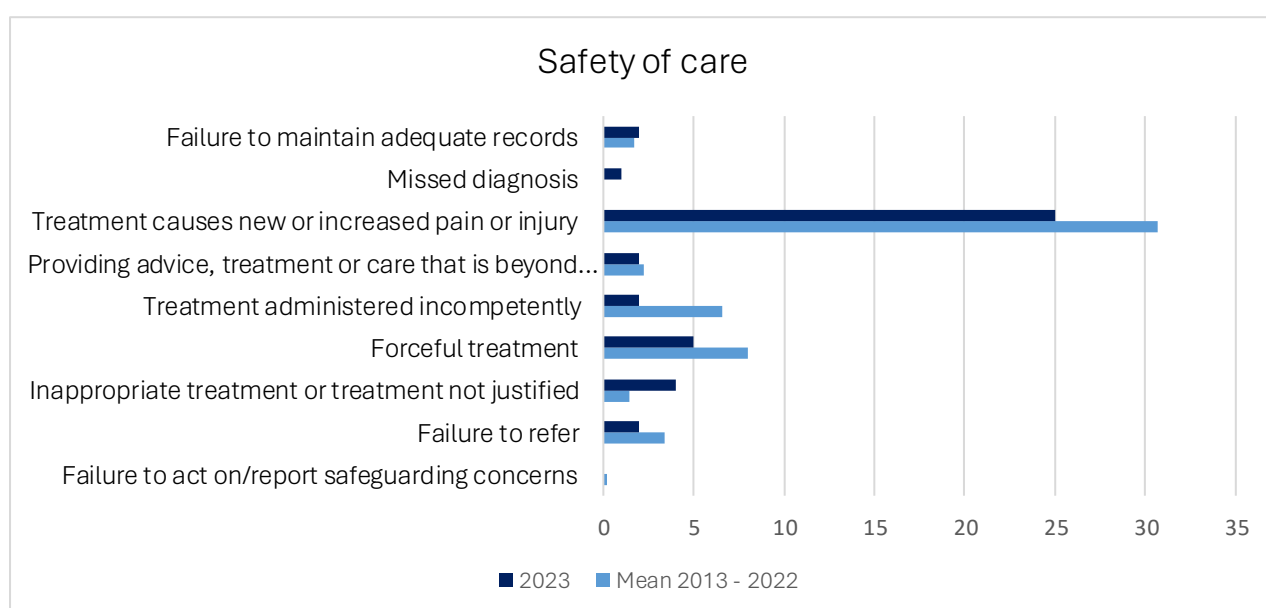


Figure 5b. Clinical Care Issues (relating to safety of clinical and osteopathic care provided).

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.

Complaints concerning not controlling the spread of communicable diseases were slightly above average, as were issues raised about value for money, and non-compliance with health and safety laws/regulation (Figure 6). Concerns about business practices and processes were very low (Figure 6a).

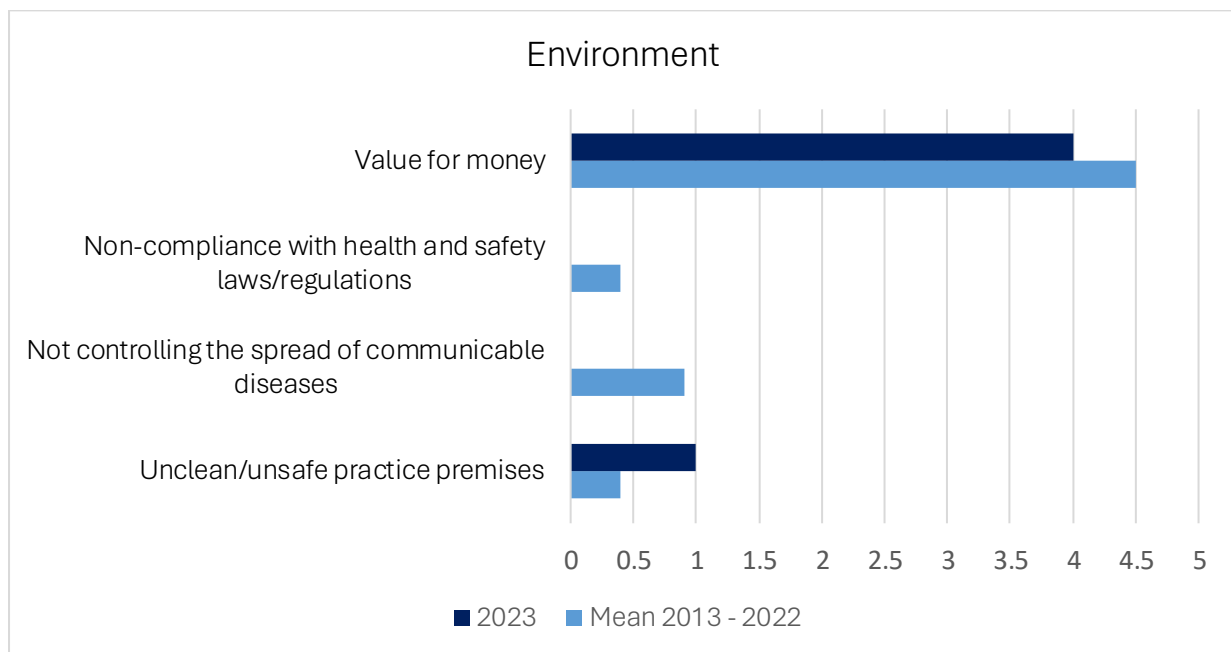


Figure 6. Management Issues relating to the environment (excluding false advertising complaints (2023 n=0))

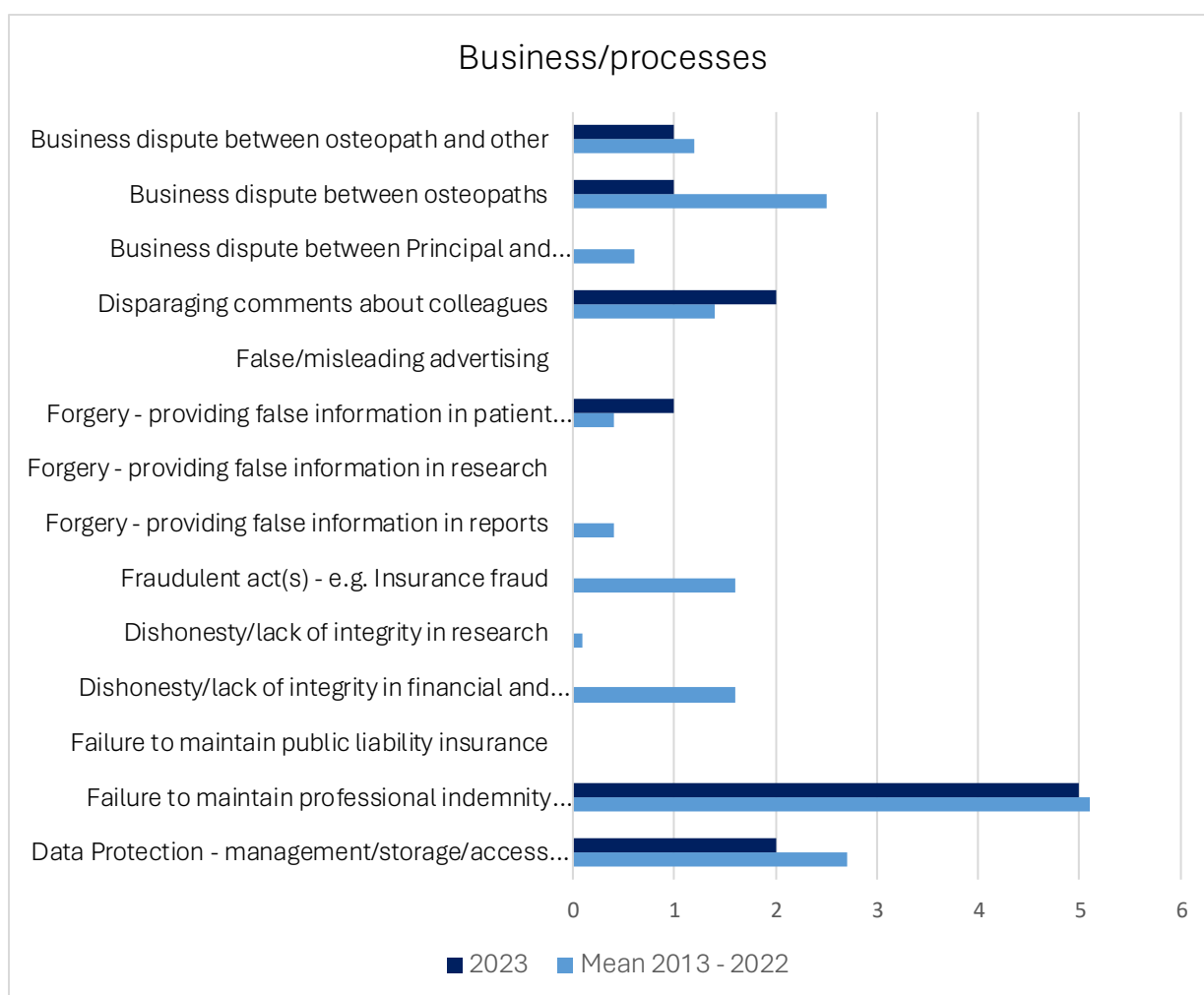


Figure 6a. Management Issues relating to the organisation within which healthcare is provided

Relations 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;
- Respect and patient rights such as disrespecting or violating patient rights.

There are 10 sub-categories in total.

There was one concern/complaint raised about consent and slightly fewer than average complaints about communicating inappropriately or ineffectively (Figure 7).

Examples of inappropriate communication include rude remarks towards a patient about their weight, inappropriate/unjustified comments about pregnancy relating to the Covid vaccine and inappropriate comments construed as racist.

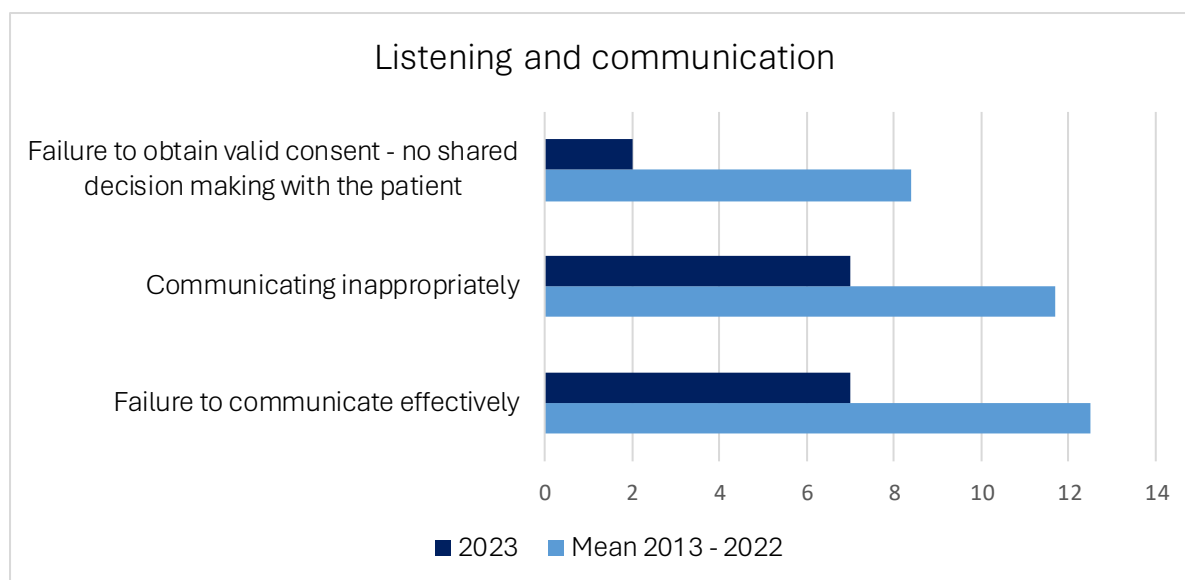


Figure 7 Listening and Communication (Healthcare staff disregard or do not acknowledge information from patients. Absent or incorrect communication from healthcare staff to patients)

Figure 7a shows that the numbers of concerns and complaints around sexual impropriety are slightly fewer than the 9-year average.

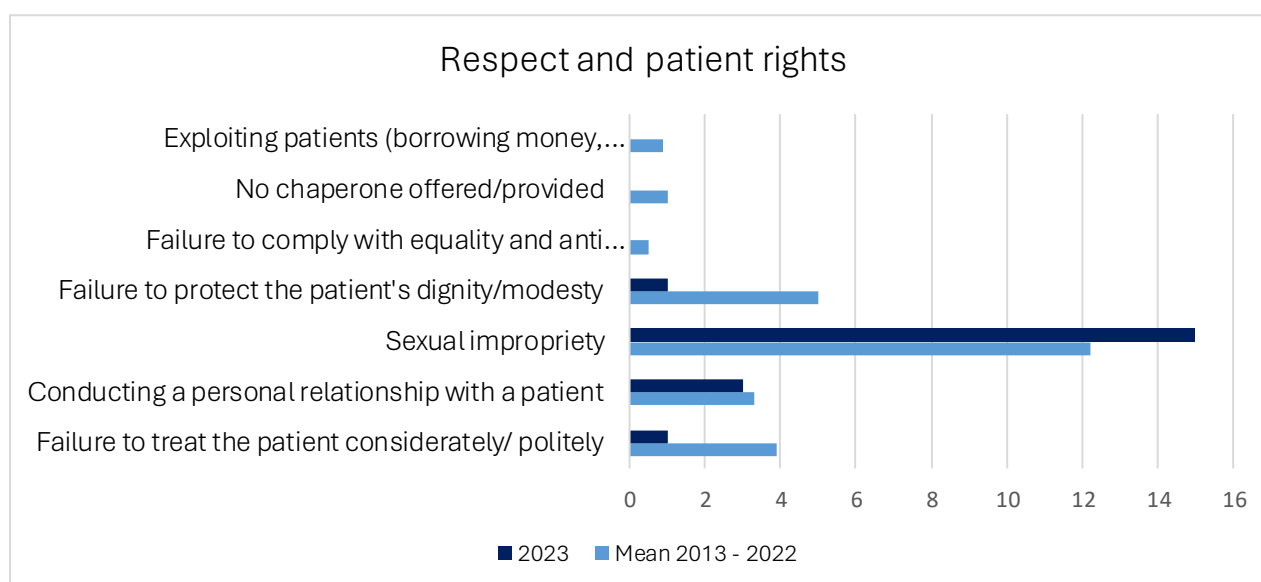


Figure 7a Respect and patient rights (Disrespect or violations of patient rights)

Adjuvant therapy

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

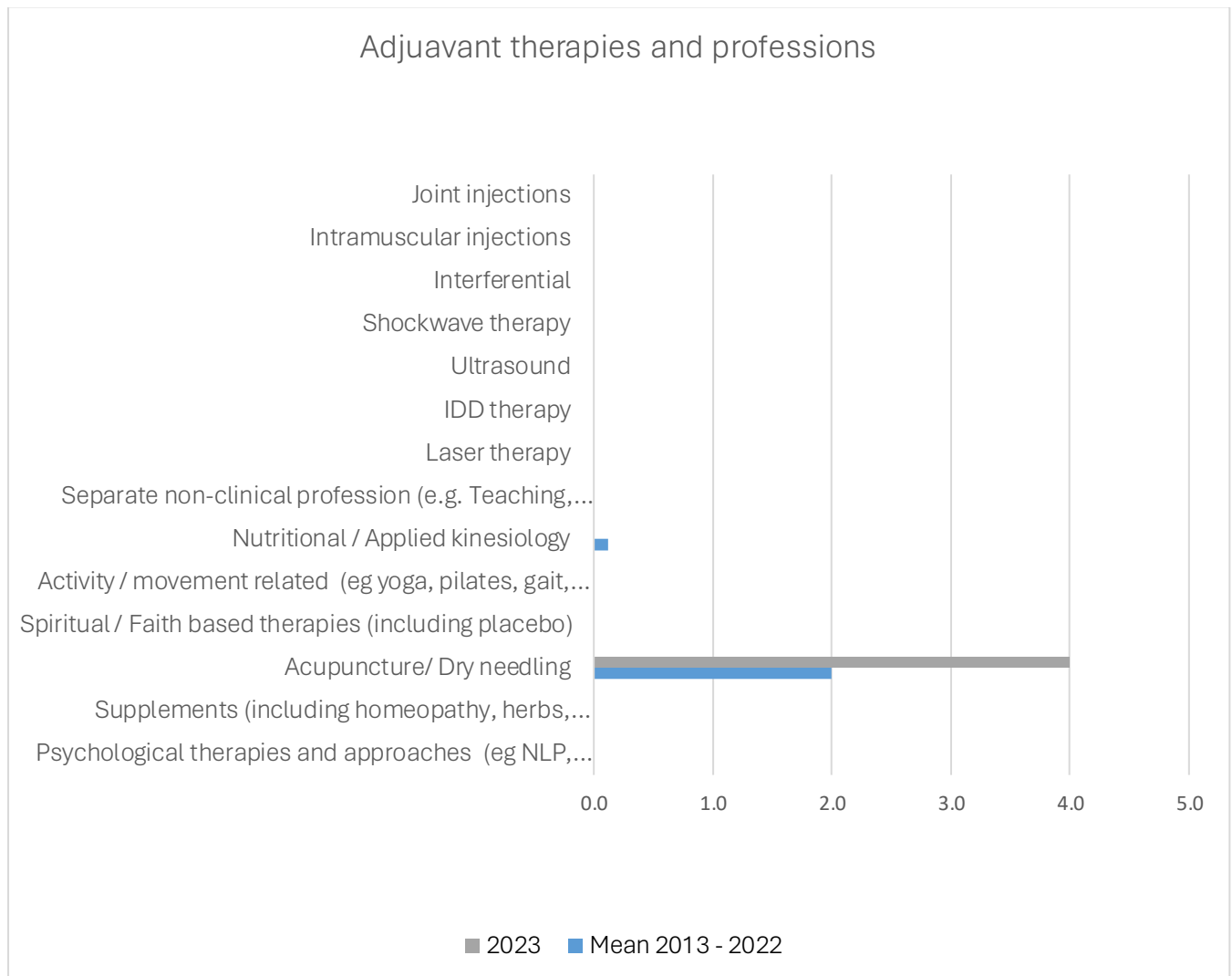


Figure 8. Adjuvant therapies and professions

Criminal convictions and police cautions

These data show the number of criminal convictions has remained the same although the nature of the convictions has changed.

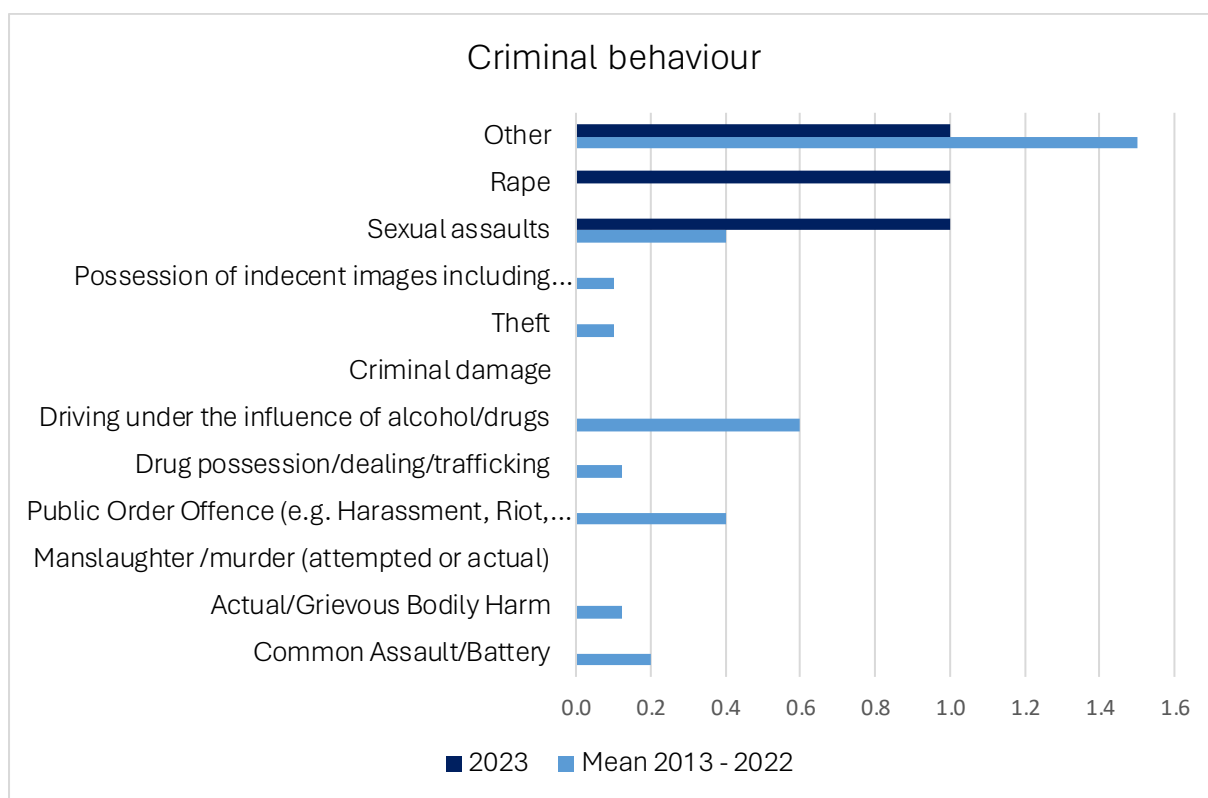


Figure 9. Criminal convictions and police cautions

Regulation specific

This year marked a considerable change in regulation-specific complaints. The sole complaint recorded was for breach of using the osteopathic title.

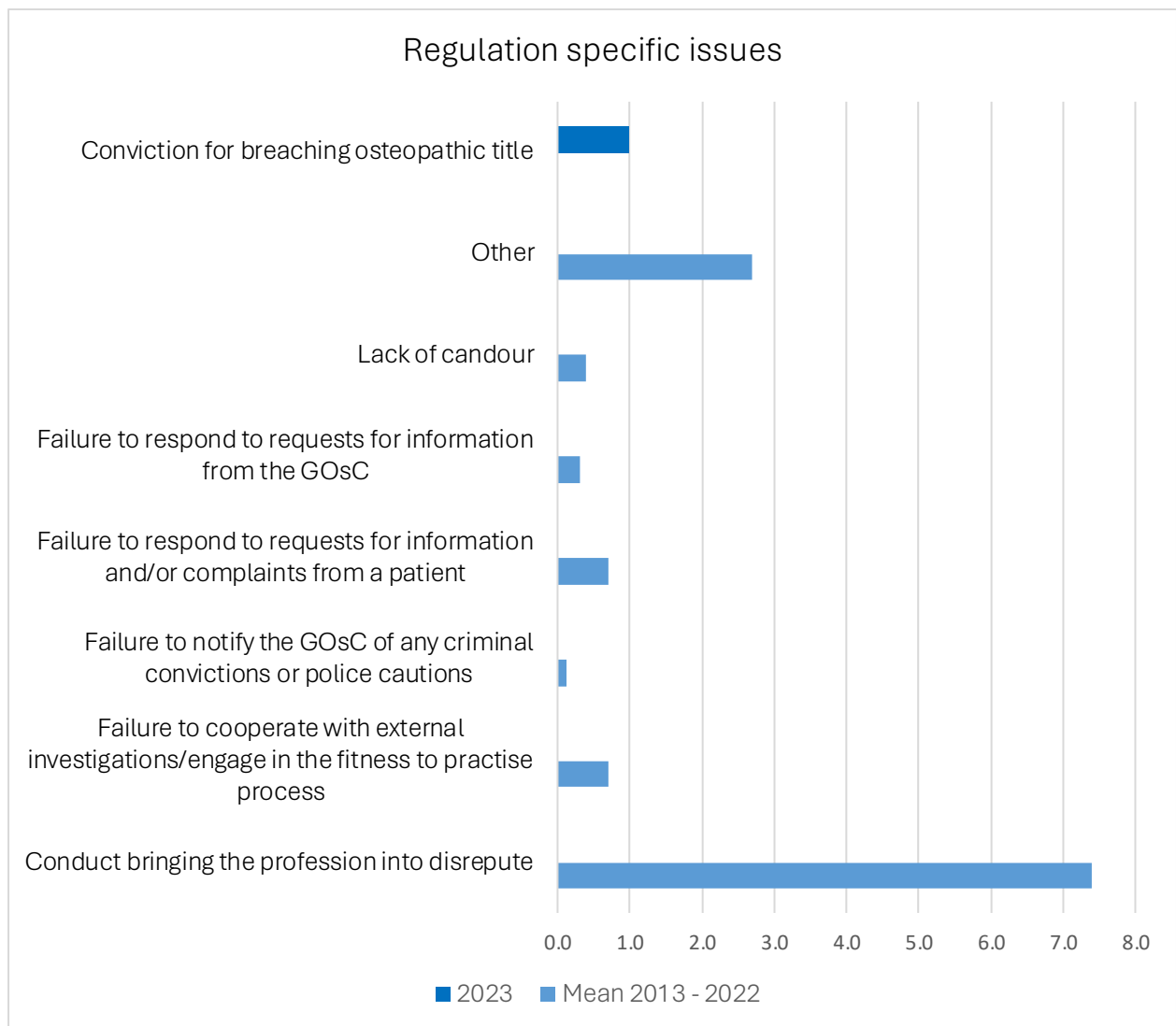


Figure 10. Regulation specific concerns and complaints

Implications for meeting Osteopathic Practice Standards (OPS)

In terms of the OPS, Safety and Quality (Theme C) is the area where most concerns and complaints have been reported since 2013 to date. Theme D: Professionalism includes 'Bringing the profession into disrepute' and 'Respect and patient rights', complaints in both these areas persist (Table 9 and Figure 11) and they have increased since 2022.

Table 9. Concerns and complaints mapped against the OPS

Osteopathic Practice Standards	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Theme A: Communication and Patient partnership	47	34	37	49	28	39	42	13	22	15	16
Theme B: Knowledge skills and experience	4	28	21	19	12	14	9	4	8	8	5
Theme C: Safety and Quality	91	138	116	128	95	67	70	23	63	66	49
Theme D: Professionalism	46	56	42	38	39	58	81	48	37	20	30

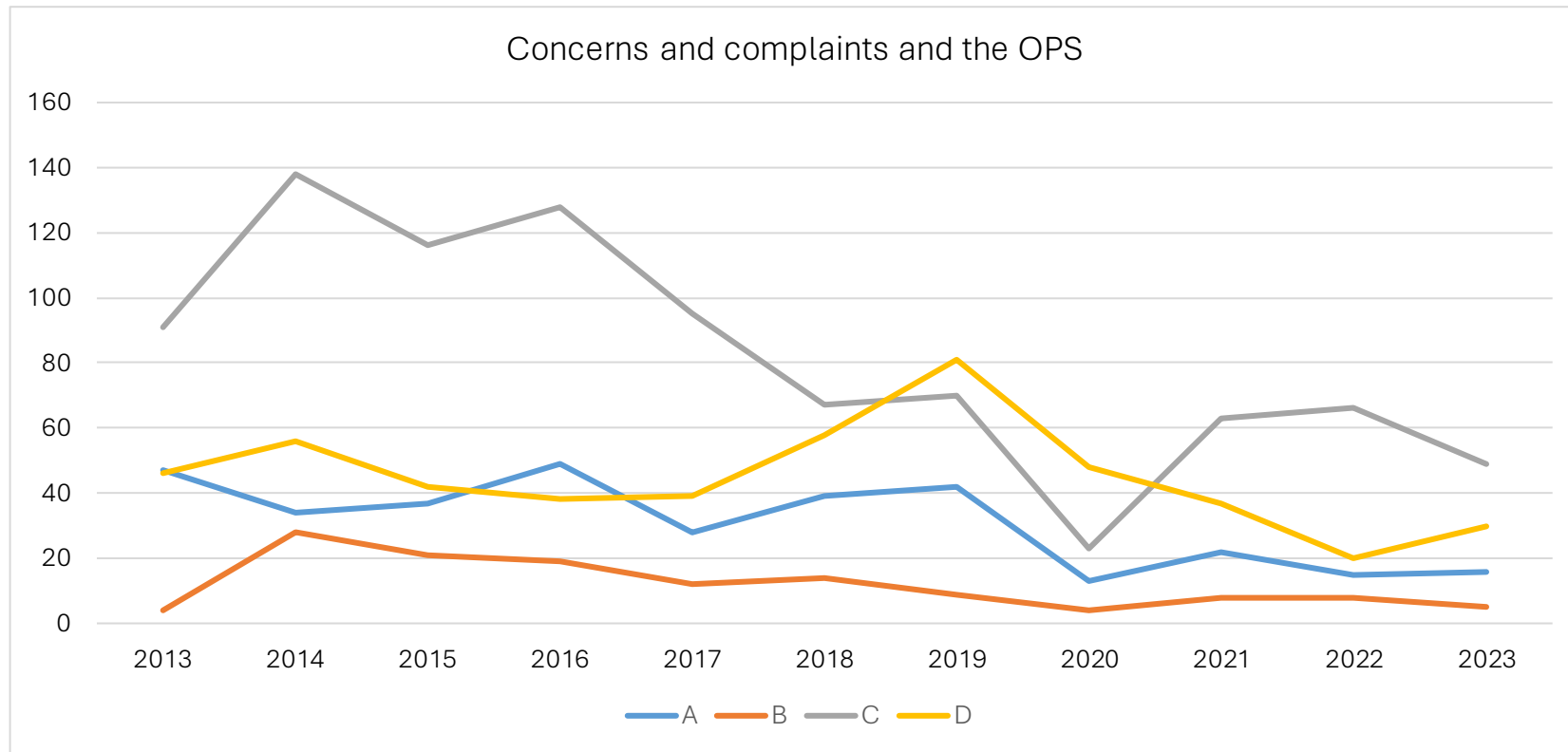


Figure 11. Number of concerns and complaints by OPS categories 2013 -2023

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

Part 2: Learning more about individuals raising concerns and complaints

When presenting the data for the 2022 concerns and complaints report, the issue was raised that no information is available concerning the individuals raising a concern or complaint. There could be areas of practice delivery or management that could be addressed if trends were identified in certain areas. To address this omission, a revised template was developed, circulated for comment in early 2023, revised based on feedback, and then used for data collection for the period 01.10.2023 to 31.12.2023. A copy of the revised template is shown in Appendix 3.

Information recorded shows that 32.5% of concerns and complaints were raised by women and 12% by men. No data were recorded in 55.5% of cases. Age data were not recorded for 87.1% of cases. Among the cases where age was recorded, the age groups 50-59 (5.1%) and 60-69 (1.7%) raised more complaints. No data about ethnic group or disability status was recorded for any of the cases raised. Equal numbers of cases were recorded from new and current patients (13.7% respectively) and data about patients' first language were not recorded in 97.4% of cases.

The patient was the most likely individual to raise a concern or complaint (71.8%), but no data were recorded in 10.3% of cases. The most frequently cited reason was concern about professional competence (17.1%). Among individuals raising concerns and complaints, the areas of the body most cited were the shoulder (12.0%), neck (7.7%), and low back (6.0%). This was a multi-response option.

Discussion and Conclusions

Summary of key findings

The number of concerns and complaints recorded for 2023 (n=121) was only slightly lower than 2022. Although there were two complaints related to consent, there remains a significant change to the 20 complaints made about this area of practice in 2013.

Issues related to communication with patients continue to be raised with seven complaints focussing upon the failure to communicate effectively and seven relating to communicating inappropriately. This compares with a high of 49 complaints of this nature in 2016. It is

difficult to know if these issues around communication relate to the content of interpersonal discourse or new methods of communication as technology is more greatly involved in day-to-day practice life.

Safety in clinical practice remains an area for concerns/complaints with issues raised concerning forceful treatment (n=5), and treatment causing new or increased pain or injury (n=25). While there may be technical considerations associated with these concerns/complaints, they could also highlight failure of communication around delivery of care and identifying patients' expectations concerning responses to treatment. The use of adjuvant therapies continues to raise concerns (n=4) and complaints with acupuncture/dry needling being the adjuvant therapy of focus.

The data for 2023 shows 15 complaints about sexual impropriety compared with 10 complaints in 2022. An increase in this number is an area of concern for all clinicians as it represents a betrayal of a trust in a healthcare professional.

This is the first year that data about individuals raising a concern or complaint have been analysed. The data are currently very limited. This is due in part to the fact that data supplied for this work is retrospective and not all of the data requested is currently available. Some stakeholders have indicated also that their current terms and conditions prohibit sharing some areas of data relating to individuals raising concerns/complaints. This is very much a work in progress and hopefully the data for the period 01.01.2024 to 31.12.2024 will provide more insight to individuals contacting the regulator, the professional association, or the professions' insurers. We are grateful for the data that have been supplied and appreciate the extra time and effort that has gone into this process.

Future research

More detailed analysis will become possible as the dataset continues to grow. It would be useful also to reflect upon all of the concerns and complaints data within the context of 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 Continuing Professional Development (CPD) scheme which has now undergone one complete cycle, and other regulatory and professional initiatives. Further activities including completed

research relating to touch and boundaries could have an impact on the number and nature of concerns and complaints. This research could be valuable in determining the effect and impact of regulation on practice and be developed into appropriate CPD training activities.

Conclusions

These data continue to allow us to evaluate practice from many perspectives but most notably that of the patient. The data provide us with 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	2022	2023
Inadequate case history	2	2	2	4	3	1	0	0	1	0	1
Inadequate examination, insufficient clinical tests	2	3	4	8	7	3	3	1	2	0	3
No diagnosis/inadequate diagnosis	10	6	4	4	9	4	4	3	11	3	5
No treatment plan/ inadequate treatment plan	1	5	3	4	4	0	4	1	1	5	2
Termination of Osteopath/ Patient relationship	2	2	1	2	0	3	2	1	1	1	4
Breach of patient confidentiality	3	4	0	0	3	4	3	0	0	0	2
Health of osteopath (to deliver care)			1	3	6	2	3	4	3	1	0
Totals	20	22	15	25	32	17	19	10	19	10	17

Mean total number of complaints 2013-2023: 18.7 (range 10-32)

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Failure to act on/report safeguarding concerns	0	1	0	0	0	0	0	1	0	0	0
Failure to refer	5	4	2	3	4	0	2	0	9	5	2
Inappropriate treatment or treatment not justified	15	27	18	29	16	6	15	3	10	8	4
Forceful treatment	4	14	9	15	5	12	8	2	4	7	5
Treatment administered incompetently	1	22	11	10	3	1	4	2	7	5	2
Providing advice, treatment or care that is beyond the competence of the osteopath	0	3	6	2	1	5	2	1	0	2	2
Treatment causes new or increased pain or injury	34	42	42	40	34	29	20	11	25	30	25
Missed diagnosis (new category 2023)											1
Failure to maintain adequate records	4	2	1	4	2	1	0	3	0	0	2
Totals	63	115	89	103	65	54	51	23	55	52	43

Mean total number of complaints 2013-2023: 65.2 (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	2022	2023
Unclean/unsafe practice premises	0	1	1	0	1	0	0	0	1	0	1
Not controlling the spread of communicable diseases	0	0	1	0	0	0	0	6	1	1	0
Non-compliance with health and safety laws/regulations	0	1	0	0	2	0	0	0	0	1	0
Value for money	7	7	5	3	2	2	8	3	3	5	4
Totals	7	9	7	3	5	2	8	9	5	7	5

Mean total number of complaints 2013-2023: 6.1 (range 2-9)

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

	2013	2014	2015	2016	2017	2018	2019	2021	2022	2023
Data Protection - management/storage/access of confidentiality data	4	3	2	2	2	6	6	2	0	2
Failure to maintain professional indemnity insurance	0	2	6	11	4	12	7	6	3	5
Failure to maintain professional liability insurance (new category 2023)										0
Dishonesty/lack of integrity in financial and commercial dealings	1	2	5	4	1	1	2	0	0	0
Dishonesty/lack of integrity in research	0	1	0	0	0	0	0	0	0	0
Fraudulent act(s) - e.g. Insurance fraud	4	1	3	4	0	0	4	0	0	0
Forgery - providing false information in reports	2	1	1	0	0	0	0	0	0	0
Forgery - providing false information in research	0	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	1

False/misleading advertising*	(3)	(9)	(156)	(177)	(80)	(4)	(5)	(1)	(2)	(0)
Disparaging comments about colleagues	2	3	1	1	4	3	0	0	0	2
Business dispute between Principal and Associate osteopaths	2	0	0	0	0	2	1	1	0	0
Business dispute between osteopaths	5	14	1	0	1	1	1	0	1	1
Business dispute between osteopath and other	5	1	1	0	0	0	0	0	5	1
Totals	25	28	21	23	12	26	22	16	9	12

*excluded

Mean total number of complaints 2013-2023 (excluding false misleading advertising): 18.8 (range 11-28)

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	2022	2023
Failure to communicate effectively	12	15	17	18	5	15	20	8	7	8	7
Communicating inappropriately	15	5	12	18	14	15	14	3	15	6	7
Failure to obtain valid consent - no shared decision making with the patient	20	14	8	13	9	9	8	2	0	1	2
Totals	47	34	37	49	28	39	42	13	22	15	16

Mean total number of complaints 2013-2023: 31.1 (range 13-49)

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

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Failure to treat the patient considerately/ politely	3	3	4	7	8	8	3	1	1	1	1
Conducting a personal relationship with a patient	5	6	5	4	2	3	2	5	0	1	3
Sexual impropriety	12	13	14	7	11	12	17	14	12	10	15
Failure to protect the patient's dignity/modesty	10	6	11	5	6	4	7	0	1	0	1
Failure to comply with equality and anti- discrimination laws	0	0	4	1	0	0	0	0	0	0	0
No chaperone offered/provided	3	1	3	0	1	1	1	0	0	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	0	0
Totals	34	31	42	26	28	28	32	20	15	12	20

Mean total number of complaints 2013-2023: 26.2 (range 12 – 42)

Table A7. Adjuvant therapies / professions

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Psychological therapies and approaches (e.g. NLP, Mindfulness, CBT, Counselling)							0	0	0	0	0
Supplements (including homeopathy, herbs, vitamins etc)							0	0	0	0	0
Acupuncture/ Dry needling	2	3	1	1	2	1	2	3	3	2	4
Spiritual / Faith based therapies (including placebo)							0	0	0	0	0
Activity / movement related (e.g. yoga, Pilates, gait, analyses, podiatry (insoles)							0	0	0	0	0
Nutritional / Applied kinesiology	0	0	0	1	0	0	0	0	0	0	0
Separate non-clinical profession (e.g. Teaching, Building, Sales, Research)							0	0	0	0	0
Laser therapy (added 2023)											0
IDD therapy (added 2023)											0

Ultrasound (added 2023)											0
Shockwave therapy (added 2023)											0
Interferential (added 2023)											0
Intramuscular injections (added 2023)											0
Joint injections (added 2023)											0
Total	2	3	1	2	2	1	2	3	3	2	4

Mean total number of complaints 2013-2023: 2.1 (range 1-3)

Table A8. Criminal convictions and Police Cautions

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Common Assault/Battery	0	1	0	0	0	0	1	0	0	0	0
Actual/Grievous Bodily Harm	0	1	0	0	0	0	0	0	0	0	0
Manslaughter /murder (attempted or actual)	0	0	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	0	0
Drug possession/dealing/trafficking	0	1	0	0	0	0	0	0	0	0	0
Driving under the influence of alcohol/drugs	1	1	1	0	2	0	0	1	0	0	0
Criminal damage			0	0	0	0	0	0	0	0	0
Theft			0	0	0	0	0	0	1	0	0
Possession of indecent images including child pornography	0	0	0	0	0	0	0	0	0	1	0
Sexual assaults	1	1	0	0	0	0	0	0	0	2	1
Rape	0	0	0	0	0	0	0	0	0	0	1
Other			0	0	0	2	2	3	5	0	1
Total	3	6	1	1	2	2	4	4	6	3	3

Mean total number of complaints 2013-2023: 3.2 (range 1-6)

Table A9. Regulation Specific

	2015	2016	2017	2018	2019	2020	2021	2022	2023
Conduct bringing the profession into disrepute	0	1	13	9	22	13	13	3	0
Failure to cooperate with external investigations/engage in the fitness to practise process	0	0	1	1	5	0	0	0	0
Failure to notify the GOsC of any criminal convictions or police cautions	0	0	0	0	1	0	0	0	0
Failure to respond to requests for information and/or complaints from a patient	0	0	1	3	3	0	0	0	0
Failure to respond to requests for information from the GOsC	0	0	1	0	2	0	0	0	0
Lack of candour	0	0	1	2	1	0	0	0	0
Other*						4	0	4	0
Conviction for breaching osteopathic title									1
Total	0	1	17	15	34	17	13	7	1

Mean total number of complaints 2013-2023: 11.7 (range 0-34)

* "Other" includes:

- Other - conviction for careless driving
- Other - messaging under age girl(s)
- Other - received restraining order
- Other - fraudulent activity

Appendix 2: Concerns and complaints mapped onto osteopathic practice standards⁴

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

Appendix 3 : Revised concerns and complaints template

This revised template was developed after discussion with the regulator, professional association, and three insurers' representatives. A draft version was circulated for comment in early 2023, and the final version was used for data collection in 2023.

Please indicate each descriptor with a 1 if relevant			Case number
Case patient characteristics	Sex	Female	
		Male	
		Preferred not to disclose gender preference	
		Not recorded	
	Age	<18 years	
		18-29 years	
		30-39 years	
		40-49 years	
		50-59 years	
		60-69 years	
		70-79 years	
		80-89 years	
		90 years and over	
	Ethnicity	Not recorded	
		Asian/Asian British	
		Black/African/Caribbean/Black British	
		Mixed/multiple ethnic groups	
		Other	
		White/White British	
		White (other)	
	Disability status	Not recorded	
		Yes	
		No	
	Source of complaint	Not recorded	
		Patient	
		Family member/carer	
		Friend	
		Healthcare professional (non-osteopath)	
		Another osteopath	
		Other	
	Main reason for making the complaint	Not recorded	
		Concern about professional competence	

		Sanction/removal of osteopath from register	
		Concern for future patients	
		Advised by family member/carer	
		Advised by healthcare professional	
		Other	
		Not recorded	
	Was the patient a new patient at the time of the complaint?	Yes	
		No	
	Is the patient's first language English?	Yes	
		No	
	Which area(s) of the body was/were treated?	Head/face	
		Neck	
		Shoulder	
		Upper back	
		Wrist/hand	
		Low back	
		Pelvis	
		Hip/thigh	
		Knee	
		Ankle/foot	
Chest/thorax			
Abdomen			
Other			
Not applicable			
Not reported			
Case osteopath characteristics	Sex	Female	
		Male	
		Not recorded	
	Age	20 - 30	
		31-40	
		41-50	
		51-60	
		61-70	
		70+	
	Years since qualification	0 to 2	
		3 to 5	
		6 to 10	
		11 to 15	
		16 to 20	
		21 to 26	
		26 to 30	
		31 to 35	
		36 to 40	
		Over 40	

	Location	Not recorded	
		England	
		N.Ireland	
		Wales	
		Scotland	
		Other	
		Not recorded	
	Working pattern	Full time (35 hours per week or more)	
		Part time (less than 35 hours per week)	
		Not recorded	
	Practice setting	Working alone in single-handed practice	
		Working in group osteopathic practice	
		Working in multidisciplinary practice	
		A combination of the above	
		Working in the NHS	
		Other	
		Not recorded	
	Treatment delivered	Soft tissue/massage	
		Joint articulation	
		High velocity thrust technique	
		Myofascial release	
		Visceral techniques	
		Functional techniques	
		Strain/counterstrain	
		Muscle energy	
		Cranial techniques	
		No treatment	
		Not recorded	
	First complaint made against this osteopath?	Yes	
		No	
		Unknown	
Clinical Care Issues (relating to quality and safety of clinical and osteopathic care provided (ie, doctors, nurses, radiologists, and allied health professionals))	Quality of clinical practices (Clinical standards of healthcare staff behaviour)	Inadequate case history	
		Inadequate examination, insufficient clinical tests	
		No diagnosis/inadequate diagnosis	
		No treatment plan/inadequate treatment plan	
		Termination of Osteopath/Patient relationship	
		Breach of patient confidentiality	

		Health of osteopath (to deliver care)	
	Safety of clinical practice (Errors, incidents, and staff competencies)	Failure to act on/report safeguarding concerns	
		Failure to refer	
		Inappropriate treatment or treatment not justified	
		Forceful treatment	
		Treatment administered incompetently	
		Providing advice, treatment or care that is beyond the competence of the osteopath	
		Treatment causes new or increased pain or injury	
		Missed diagnosis	
		Failure to maintain adequate records	
Management Issues (relating to the environment and organisation within which healthcare is provided (for which administrative, technical, facilities and management staff are usually responsible))	Environment (Problems in the facilities, services, clinical equipment, and staffing levels)	Unclean/unsafe practice premises	
		Not controlling the spread of communicable diseases	
		Non-compliance with health and safety laws/regulations	
		Value for money	
	Business /Processes (Problems in bureaucracy, waiting times, and accessing care)	Data Protection - management/storage/access of confidentiality data	
		Failure to maintain professional indemnity insurance	
		Failure to maintain professional liability insurance	
		Dishonesty/lack of integrity in financial and commercial dealings	
		Dishonesty/lack of integrity in research	
		Fraudulent act(s) - e.g. Insurance fraud	
		Forgery - providing false information in reports	
		Forgery - providing false information in research	
		Forgery - providing false information in patient records	
		False/misleading advertising	
		Disparaging comments about colleagues	

		Business dispute between Principal and Associate osteopaths	
		Business dispute between osteopaths	
		Business dispute between osteopath and other	
Relations Issues (relating to the behaviour of any specific member of staff towards the patient or their family/friends)	Listening and Communication (Healthcare staff disregard or do not acknowledge information from patients. Absent or incorrect communication from healthcare staff to patients)	Failure to communicate effectively	
		Communicating inappropriately	
		Failure to obtain valid consent - no shared decision making with the patient	
	Respect and Patient rights (Disrespect or violations of patient rights by staff)	Failure to treat the patient considerately/ politely	
		Conducting a personal relationship with a patient	
		Sexual impropriety	
		Failure to protect the patient's dignity/modesty	
		Failure to comply with equality and anti discrimination laws	
		No chaperone offered/provided	
		Exploiting patients (borrowing money, encouraging large gifts, inappropriate fees, pressuring patients to obtain services for financial gain)	
Adjuvant therapies / professions		Psychological therapies and approaches (eg NLP, Mindfulness, CBT, Counselling)	
		Supplements (including homeopathy, herbs, vitamins etc)	
		Acupuncture/ Dry needling	
		Spiritual / Faith based therapies (including placebo)	
		Activity/ movement related (eg yoga, pilates, gait, analyses, podiatry(insoles))	
		Nutritional / Applied kinesiology	
		Separate non-clinical profession (eg Teaching, Building, Sales, Research etc)	

		Laser therapy	
		IDD therapy	
		Ultrasound	
		Shockwave therapy	
		Interferential	
		Intramuscular injections	
		Joint injections	
Criminal convictions and Police Cautions		Common Assault/Battery	
		Actual/Grievous Bodily Harm	
		Manslaughter /murder (attempted or actual)	
		Public Order Offence (e.g. Harassment, Riot, Drunken and disorderly, and racially aggravated offences	
		Drug possession/dealing/trafficking	
		Driving under the influence of alcohol/drugs	
		Criminal damage	
		Theft	
		Possession of indecent images including child pornography	
		Sexual assaults	
		Rape	
		Other	
Regulation specific		Conduct bringing the profession into disrepute	
		Failure to cooperate with external investigations/engage in the fitness to practise process	
		Failure to notify the GOsC of any criminal convictions or police cautions	
		Failure to respond to requests for information and/or complaints from a patient	
		Failure to respond to requests for information from the GOsC	
		Lack of candour	
		Other	
		Breach of osteopathic title	

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