

Osteopathic Practice Committee**14 May 2013****Development of a common classification system for recording and monitoring claims and complaints about osteopaths**

Classification	Public
Purpose	For noting
Issue	The paper outlines a new joint initiative that aims to collect and link data relating to claims and complaints about osteopaths in order to identify and monitor trends on an annual basis.
Recommendation	To note the content of this paper
Financial and resourcing implications	Staff resources are accounted for in the current budget. The proposed NCOR work has yet to be confirmed and costed, but it is anticipated that costs will be shared between the organisations that contribute data and that the GOsC will be able to accommodate our expenses within the current budget.
Equality and diversity implications	None arising from this paper.
Communications implications	None arising from this paper.
Annex	Osteopathic complaints and claims classification and data collection tool, version April 2013.
Author	Brigid Tucker

Background

1. The General Osteopathic Council (GOsC) funded four interlinked research projects designed to gain a better understanding of any potential risk that may be associated with osteopathic care. These are known as the *NCOR Adverse Events Projects*.
2. One of these projects (*NCOR Adverse Events Project No. 3¹*), which reported in October 2011, examined the nature and frequency of complaints and insurance claims made about osteopaths between 2004 and 2008. Research of this type critically depends upon access to and interpretation of the data held by organisations that manage complaints and claims made about osteopaths. The research team was given access to complaints and claims data and contextual information held by the General Osteopathic Council (GOsC), the British Osteopathic Association (BOA), and four osteopathic professional indemnity insurance providers: Balens; Howden; Three Counties; and Towergate Medical Insurance Agency.
3. The full report of the NCOR Adverse Events Project No. 3 is available on the GOsC's website at: www.osteopathy.org.uk/resources/research/Adverse-events-studies
4. The final report advocated the systematic monitoring of complaints and claims relating to osteopathic practice, in order to better understand and address the issues and circumstances that give rise to concerns and complaints about osteopaths. To this end, it recommended that the organisations who receive these complaints – specifically the GOsC, the BOA and osteopathic indemnity insurance providers – adopt a common system for classifying and recording complaints and claims about osteopaths. A standardised classification system, it is suggested, has potential to improve the quality and accuracy of data collection, enable data linking, and generate a regular and comprehensive indication of trends in complaints and claims about osteopaths.

Development of a common classification system for recoding complaints and claims about osteopaths

5. A project initiation meeting on 15 October 2012 confirmed 'in principle' agreement to the adoption of common system for classifying and coding claims and complaints about osteopaths, with a view to data pooling and the identification and monitoring of trends.
6. The meeting established a working group to develop the joint initiative, comprising:
 - Balens Insurance Brokers
 - Giles Insurance Brokers

¹ Complaints and claims against osteopaths: a baseline study of the frequency of complaints 2004-2008 and a qualitative exploration of patients' complaints. NCOR Adverse Events Project No. 3 – the CONDOR study. Leach J, Fiske A, Mullinger B, Ives R, Mandy A. October 2011.

- Howdens Insurance Brokers
 - Locktons Insurance Group
 - LFC insurance
 - Three Counties Insurance
 - Townergate Medical Insurance Agency
 - The British Osteopathic Association
 - The General Osteopathic Council.
7. The primary aim was agreed by all parties to identify aspects of osteopathic practice that generate most complaints or claims, to inform education, training and guidance, and thereby potentially to reduce the number of complaints and claims.
 8. A second meeting of the working group on 6 December 2012 considered and agreed a common classification system for claims and complaints about osteopaths.
 9. It was further agreed that all participating organisations would begin recording complaints and claims using the common classification system as from January 2013. A 4-month review meeting was scheduled for 29 April 2013 to assess the need for any adaptations to the data collection system. The classification and data collection tool agreed in April 2013 is annexed. The data collection tool will be kept under regular review and adapted as necessary to ensure it has adequate categories for data capture.

Data collection

10. *Formal and informal complaints/claims:* in order to capture the full picture of the circumstances that provoke complaints/claims, participating organisations will record the allegations made in both informal and formal complaints and claims. Data will be recorded once only, at the point when a complaint/claim is first received, to avoid data duplication when an informal concern evolves into a formal complaint. This approach is in line with the purpose of the data collection: to generate information that will give us a better understanding about what is causing complaints/claims, irrespective of whether the complaint/claim is ultimately progressed through to a formal hearing and proven.
11. *Duplication:* participating organisations considered in detail mechanisms for avoiding duplication of data, which would occur when complaints are made to more than one organisation, i.e. the regulator, the BOA and/or the insurer. Some duplication of the data would be unavoidable and it was agreed this should be highlighted in the final annual report, however processes have been embedded to minimise duplication.

Data management and analysis

12. Participating organisations have agreed to collect data in 12-month cycles, January to December, from January 2013. In January 2014, contributing

organisations will submit their 2013 data directly to the National Council for Osteopathic Research (NCOR). Data will be entirely numerical, including no personal identifiable information.

13. Data will be aggregated and analysed by NCOR to produce an Annual Report for participating organisations, the costs of this work to be shared.

Outcomes

14. The introduction of routine quantitative analysis of claims and complaints relating to osteopathic practice in the UK, in order to observe patterns, changes and trends over time and over type of complaint.
15. Quantitative evidence of the circumstances, practices and behaviours that cause people to complain about or make a claim against an osteopath.
16. Evidence-based information to inform the development of targeted guidance and education for the osteopathic profession, that has the aim of reducing the number of complaints and claims made about osteopaths.

Conclusion

17. Representing the interests of the public/patients, practitioners, and professional indemnity insurance providers, the organisations contributing to this joint initiative have in common an interest in reducing the number of complaints and claims made about osteopaths. A better understanding of the nature and cause of complaints/claims could helpfully inform the training of students and the continuing professional development of osteopaths, the guidance and standards developed by the regulator for registrants, and the information provided to osteopathic patients and the public.
18. As a new initiative, dependent on cooperation, trust and collaboration between a range of stakeholder organisations, progress will need to be carefully monitored and the project periodically reappraised. The Executive will report regularly on the development of this initiative.

Recommendation: to note the contents of this paper.