



Consultation on Draft Guidelines for the Provision of Relevant Services (Health and Related Services)

Osteopathy Australia welcomes the opportunity to provide feedback on the draft *Guidelines for the Provision of Relevant Services (Health and Related Services)* (The Guidelines).

Osteopathy and Osteopathy Australia

Osteopathy Australia is the peak body representing the interests of osteopaths, osteopathy as a profession, and consumer's rights to access osteopathic services. Our core work is liaising with state and federal government, and all other statutory agencies, professional bodies, and private industry regarding professional, educational, legislative, and regulatory issues. The vast majority of registered osteopaths are members of Osteopathy Australia.

Osteopaths in Australia are university qualified allied health practitioners who are registered with the Australian Health Professionals Regulation Agency (AHPRA). Osteopaths complete either a dual bachelor or bachelor and master's qualification covering functions of anatomy, biomechanics, human movement, the musculoskeletal and neurological systems as well as clinical intervention approaches which are all underpinned by a biopsychosocial management approach.

Osteopaths are one of the many allied health professionals who work with worker's compensation and compulsory third party (CTP) clients throughout New South Wales (NSW). Osteopathic treatment and management are underpinned by a biopsychosocial approach and are consistent with the national endorsed *Clinical Framework for the Delivery of Health Services*. Osteopaths conduct comprehensive functional examinations and apply evidence-based reasoning to case management and treatment to assist clients in returning to pre-injury function.

Recommendation Summary:

After reviewing the draft Guidelines for the Provision of Relevant Services (Health and Related Services) Osteopathy Australia has two key recommendations regarding the broad nature of wording within two sections of the guidelines.

Recommendation 1: To remove any ambiguity, SIRA should be required to demonstrate the need for and relevance of any additional training that may be mandated by SIRA in relation to providing relevant services within the workers compensation scheme in section 27.

Recommendation 2: To remove ambiguity and the potential for misuse of powers, the intended purpose and scope of the reviews that could be undertaken should be identified within section 28, and a statement included that the involved reviewers will have the skill sets to match the scope of the review.

Recommendation 1: To remove any ambiguity, SIRA should be required to demonstrate the need for and relevance of any additional training that may be mandated by SIRA in relation to providing relevant services within the workers compensation scheme in section 27.

Section 27 of the draft Guidelines states *RSPs must complete any additional training at the request of SIRA, to the standard required by SIRA, within the required timeframe and at the practitioner's own expense.* Osteopathy Australia believes that this statement is too broad and would provide SIRA with undue power to force RSPs to undertake unnecessary additional training at the provider's own cost.

This statement should be amended to include at a minimum that the training is "reasonable, relevant and justified" within the worker's compensation guidelines. This will ensure that the training is clinically and or practically related to the provision of worker's compensation treatment and management.

Recommendation 2: To remove ambiguity and the potential for misuse of powers, the intended purpose and scope of the reviews that could be undertaken should be identified within section 28, and a statement included that the involved reviewers will have the skill sets to match the scope of the review.

Section 28 states that *RSPs must fully cooperate with reviews by injury management consultants, or any other independent review of relevant services arranged by insurers, in the form, timeframes and manner required by SIRA from time to time.* However, no associated information is provided about the circumstances in which a review could be undertaken.

In particular, Osteopathy Australia is concerned that this statement is too broad and may result in practitioners having their clinical treatment and management of a client assessed by a non-clinical reviewer. While within the recent consultation on the amendments to the *State Insurance and care Governance Act 2015* (the Act) it was confirmed that SIRA will not be intervening within patient care or clinical decisions when issuing directions, this should also be stated within the Guidelines in reference to any reviews that may be undertaken. Without clarification of the scope of potential reviews, Section 28 can be left open to interpretation, resulting in reviews being conducted that are not consistent with the intentions of the Act.

Osteopathy Australia thanks SIRA NSW for this opportunity to provide feedback on the Guidelines and is contactable on [REDACTED] for any further information or discussion.