

**Australian Osteopathic Accreditation Council (AOAC)**

**Review of the Osteopathic Accreditation  
Standards (Consultation paper 2)**

**Submission by OSTEOPATHY AUSTRALIA**

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**CONTACT**

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## INTRODUCTION

Osteopathy Australia thanks the AOAC for the opportunity to lodge a submission addressing the consultation paper *Review of the Osteopathic Accreditation Standards (Consultation Paper 2)*.

We continue to commend AOAC for their open, transparent, and consultative processes.

## OSTEOPATHY AUSTRALIA

Osteopathy Australia is the professional association for the osteopathy industry in Australia. We act by representing the interests of osteopathy students, osteopaths, osteopathy as a profession, and consumer's rights to access osteopathic services.

We promote standards of professional behaviour over and above the requirements of AHPRA registration. A vast majority of osteopathy students and registered osteopaths are members of Osteopathy Australia.

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 for the osteopathy profession. As such, we have close working relationships with the Osteopathy Board of Australia (OBA), the Australian Health Practitioner Regulation Agency (AHPRA), and the AOAC, to which this submission is addressed. We also maintain strong working relationships with other professional health bodies through our collaborative work with Allied Health Professions Australia (AHPA) and specific working initiatives with individual allied health peak bodies.

As an organisation we establish diverse working groups, develop collaborative projects, and receive a vast amount of written and verbal feedback regarding the state of the osteopathy industry, its educational institutions and all manner of associated quality and governance issues. We receive this feedback from students, registered osteopaths, and osteopathy academic staff. We draw on our extensive experience in responding to the AOAC's timely inquiry.

We address your questions within our submission.

**QUESTION 1: Do the draft accreditation standards cover the required knowledge, skills, and attitudes to enable new graduates to meet the OBA's *Capabilities for osteopathic practice 2019* (Osteopathic Board, 2019)? Please provide an explanation for your answer.**

Osteopathy Australia agrees that the draft accreditation standards cover the required knowledge, skills, and attitudes to enable new graduates to meet the OBA's *Capabilities for osteopathic practice 2019*.

Unfortunately, as the standard map current osteopathic capabilities and practice but do not address future needs or health priorities as the *Capabilities* themselves lack the future focus needed for students graduating in half a decade's time. As such we consider it is vital that institutions have the flexibility to address those within course curricula without jeopardising accreditation.

**QUESTION 2 & 3: Are there any additional criteria that should be included? / Are there any criteria that could be deleted or amalgamated with another criteria?**

After discussion with Universities and other stakeholders we could not identify any additional criteria nor any Standards that are duplicated.

**QUESTION 4: Does the draft structure reduce duplication within the standards? If not, which areas of duplication still exist?**

The draft structure is clearer than prior versions, and duplication only exists where warranted.

**QUESTION 5: Please provide any other feedback about the structure and/or content on the draft standards.**

After discussion with Universities and other stakeholders a few minor comments or suggestions were raised.

General issues:

- The Development of an evidence guide to increase understanding and assist institutions with accreditation documentation was discussed as essential to streamline accreditation reporting and processes.
- It is preferred that the standards and accreditation processes are as consistent as possible with other registered or self-regulated professions. This allows further streamlining across health sciences school, courses, and the development of documentation.
- The need for some flexibility around delivery models and some accreditation standards due to the ongoing implications of the COVID 19 pandemic and its impact on course or content delivery, particularly in face-to-face clinical components.

#### Standard specific issues:

- 1.5 /1.6 /1.7 – Osteopathy Australia supports the use of private practice locations for student **clinical placements**; however, we have concerns about inadequate systems, quality control procedures, resources and training offered to ensure students have a safe, quality clinical placement and educational experience. For instance, we are unaware of any clinical audit or quality assessment audits undertaken currently. Although these standards may be clear the evidence guide, or other guidance may be needed to ensure Universities are ensuring the above.
- 2.2 – Shouldn't this Standard, in regard to "*is a registered osteopath with the OBA, with no conditions or undertakings on their registration relating to performance or conduct*" apply to **all academic** and clinical supervisor staff, not just the head of discipline?
- 2.2 c) - Should the standard require **all clinical supervision staff**, regardless of employment or voluntary private practice placement models be indemnified by the university for clinical supervision?
- 2.4 – see points raised in 1.5/1.6/1.7 above.
- 3.3 – This standard **needs flexibility to address the ever changing, emerging or future needs and priorities** in healthcare as they change.
- 3.4 – it would be useful if this standard provided more detail on **human and physical resources expected**, or some benchmarking and evidence guidance to ensure clinical educational quality can be maintained.
- 3.8 c) – As many osteopathy students are enrolled in a Masters program and there are **limited, awarded PHD lecturers**, further detail around qualifications and experience may be needed.
- Standard 6 – In no way to diminish the importance of all the proposed Standard 6, is there **are need for additional standards around cultural safety for many ethnic, religious, or diverse communities?**

#### **QUESTION 6: Do the proposed standards encompass all aspects of Cultural Safety? Should cultural safety be integrated within the five standards or have a dedicated domain (sixth standard)?**

Osteopathy Australia applauds the AOAC for incorporate Aboriginal and Torres Strait Islander health and cultural safety in education and training standards and accreditation guidelines.

We support the intent of these questions but **defer to more knowledgeable bodies for input** such as The National Aboriginal Community Controlled Health Organisation (NACCHO), Indigenous Allied Health Australia (IAHA) or the National Aboriginal and Torres Strait Islander Health Workers Association for guidance and directions.

**QUESTION 7: Should cultural safety be integrated within the five standards or have a dedicated domain (sixth standard)?**

This is a quandary between the significance and importance demonstrated by the dedicated domain/standard compared to the benefit and more holistic integration of cultural safety through all aspects of the Standards and therefore curriculum.

Again, we would defer to more knowledgeable bodies for input such as The National Aboriginal Community Controlled Health Organisation (NACCHO), Indigenous Allied Health Australia (IAHA) or the National Aboriginal and Torres Strait Islander Health Workers Association for guidance and directions.

**QUESTION 8: How do the standards support research and evidence-based practice being included within the pre-registration curricula?**

This is a significant challenge for a developing industry such as osteopathy. Whilst significant clinical evidence exists, very little clinical research is undertaken within osteopathy learning institution within Australia. Further this may impact translational research changing and impacting change in curriculum content and or the teaching of latest knowledge. This is further challenging for a profession with historical, philosophy-based principles and practices.

It is unclear to Osteopathy Australia how the standards support research and evidence-based practice being included within the pre-registration curricula, beyond a reporting obligation. Unless accreditation processes or reporting evaluated its integration against current evidenced based practice.