

The Workplace Rehabilitation Provider Accreditation Framework in Tasmania

Submission by Osteopathy Australia to WorkSafe Tasmania

April 2022

Summary

Osteopathy Australia thanks WorkSafe Tasmania for inviting us to offer feedback for the *Workplace Rehabilitation Provider Accreditation Framework in Tasmania* (March, 2022). Our recommendations are as follows:

Recommendation 1: WorkSafe Tasmania should note Osteopathy Australia's successful profession group approval applications to WorkSafe Victoria, Transport Accident Commission Victoria, and NSW SIRA, and extend approval in Tasmania to further increase appropriate professional supply and support provider operations. Osteopathy Australia is willing to share evidence and arguments from our prior submissions with WorkSafe Tasmania in a spirit of partnership.

Recommendation 2: WorkSafe Tasmania should develop two clear application processes for emergent allied health professions seeking profession group approval:

Pathway 1) should be a comprehensive application process specific to professions that have not lodged a successful application for approval in any other jurisdiction and Tasmania is to be the entry point

Pathway 2) should be a far more streamlined application process specific to professions that have lodged a successful application in another jurisdiction prior to applying in Tasmania. The process could comprise application exemptions or a request to review evidence from prior applications.

Contact

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About osteopathy

Osteopaths in Australia are government (AHPRA) regulated allied health professionals having inbound and outbound referral relationships with other health professionals. Osteopathy is among the fastest growing allied health professions in Australia year on year, providing an increasing supply of skilled professionals to workplace rehabilitation systems nationally.ⁱ

Osteopaths complete a dual Bachelor or Bachelor/Masters qualification covering functional anatomy, biomechanics, human movement, the musculoskeletal and neurological systems, as well as clinical assessment and management approaches. As a defining characteristic, the osteopathic profession emphasises the neuromusculoskeletal system as integral to function and uses biopsychosocial and client-centred approaches in managing functional limitations. The national *Capabilities for Osteopathic Practice*ⁱⁱ outline the required professional skills, knowledge, and attributes an osteopath must possess as required by the Osteopathy Board of Australia. There is strong overlap between these capabilities and those of other allied health professions, including musculoskeletal physiotherapy and exercise physiology in clinical rehabilitation. Osteopathy registrants demonstrate the following relevant capabilities:

- Apply knowledge of clinical and biomedical sciences relevant to human health and function, psychosocial and physical environmental determinants of health, activity limitations and participation restrictions when planning, implementing and reviewing client care
- Implement, monitor and review evidence-based interventions including manual therapy, rehabilitation, pain education and health promotion
- Enable and empower clients to enhance their participation in work and other life roles
- Equitably treat clients and uphold non-discrimination based on their age, culture, disability, gender, sexuality, social status, economic status, language or ethnicity, consistent with legislative requirements
- Explain and negotiate planned assessments including risks and options with clients and relevant others

- Incorporate the key bio-psychosocial and environmental factors that contribute to clients' wellbeing (impairment, disability and participation) when planning, implementing and reviewing client care
- Negotiate a safe and appropriate management plan with the client and relevant others, including discussion of options for management
- Implement, monitor and review client-centred management plans that include relevant therapeutics such as manual therapies, rehabilitation, pain education, exercise and cognitive interventions, using the best available evidence and technologies to inform practice
- Establish a prognosis in conjunction with clients and relevant others that incorporates appropriate outcome measures and anticipated milestones of client progress
- Recognise when further information/referral is required and facilitate this to occur
- Recognise and effectively manage conflicts of interest, including unnecessary prescription of products and over-servicing
- Assess risk in designing and monitoring client care
- Advocate for clients and their rights to healthcare and other services
- Contribute to the effectiveness and efficacy of the healthcare system, including wise use of healthcare resources, and ensure that the services provided are reasonably required and not excessive or unnecessary
- Apply effective, culturally safe communication to establish a therapeutic relationship that encourages client trust and autonomy, and is characterised by empathy, respect and compassion
- Facilitate change informed by the best available research evidence and a clients' needs when new ways of working are adopted in the practice context
- Assist clients and their families to identify, access and make use of information and communication technologies to support their care and maintain their health
- Effectively use a range of communication skills, including but not limited to, negotiation, conflict management and resolution to facilitate positive working partnerships with clients and relevant others
- Critically appraise, interpret and apply learning from professional development, clinical data and client responses
- Provide health education to clients to promote health and prevent disease
- Apply principles and approaches which address the wider health determinants of clients in the community
- Evaluate the effectiveness of the education provided to clients and modify content and delivery methods where appropriate to facilitate compliance
- Work with clients and relevant others when necessary to enable access to appropriate health and community services

- Interact effectively and professionally with other health and community services and/or providers in the interests of clients
- Maintain knowledge of other health services relevant to client care and seek assistance when information is outside expertise to enhance healthcare and collaboration.ⁱⁱⁱ

Osteopaths are consulted by injured workers with musculoskeletal presentations in every state or territory and for Comcare; in providing these services, osteopaths apply the *Clinical Framework for the Delivery of Health Services*. Further, osteopaths are eligible for consultancy roles in workplace rehabilitation services contracted to the Victorian Transport Accident Authority, WorkSafe Victoria, and NSW SIRA. Self-management, optimising activity participation, and early return to work are core osteopathic care objectives. The osteopathic profession (via Osteopathy Australia) is a formal signatory to both the *Clinical Framework for the Delivery of Health Services* and *Consensus Statement on the Health Benefits of Good Work* (Royal Australian College of Physicians).^{iv v}

About Osteopathy Australia

Osteopathy Australia is the national peak body representing the interests of osteopaths, osteopathy as a profession, and consumer rights to access osteopathic services. A vast majority of registered osteopaths are members of Osteopathy Australia.

Osteopathy Australia has close working relationships with osteopathy regulators, tertiary institutions offering osteopathy courses and professional indemnity insurers.

As the national peak body, we reinforce AHPRA regulatory requirements and promote standards of professional behaviour over and above those requirements. We are a full member of the umbrella national body Allied Health Professions Australia (AHPA) with the Australian Physiotherapy Association and Exercise and Sports Science Australia.

Our core work is liaising with state and federal government, all other statutory agencies, professional bodies, and private industry regarding professional, educational, legislative, and regulatory issues. In this capacity we have partnerships with each state and territory compensable injury management scheme (worker's compensation and motor accidents), and workplace rehabilitation providers recruiting osteopaths (i.e. APM, Konekt Work Care, Kinnect, Work Focus).

As national representative body, we welcome the opportunity to lodge feedback to WorkSafe Tasmania.

Approving osteopathy

WorkSafe Tasmania can be confident that in regulating to extend osteopathy's eligibility to workplace rehabilitation services, an appropriately qualified and competent profession would support the jurisdiction.

We developed the applications needed for Victoria and NSW, and each jurisdiction applied a rigorous accreditation assessment showing:

- Osteopaths complete tertiary studies on skills, awareness and competencies well aligned to the *Health Benefits of Good Work Position Statement, Clinical Framework for the Delivery of Health Services, and Principles of Practice for Workplace Rehabilitation Providers (2019)*
- Osteopaths acquire technical awareness in assessments and reviews required for skilled clinical consultancy in workplace rehabilitation for the physical professions; this includes biopsychosocial functional assessments, work activity based assessments, assessments of capacity, workplace assessments, as well as report writing for these assessments
- Osteopaths are well trained in evidence appraisal and reviewing plans against best available evidence
- Osteopaths are regulated by the same processes and codes as all other AHPRA registered workplace rehabilitation approved professions; WorkSafe Tasmania has proven experience of AHPRA registration, audit and reporting mechanisms as a line for risk management and compliance
- Osteopaths have an important and valued role within large workplace rehabilitation provider businesses as part of diverse clinical workforces. We were able to gather evidence from providers demonstrating osteopaths support good results for timeliness and completion of service.

We are willing to share and discuss evidence from our applications with WorkSafe Tasmania and wish to work closely as the agency regulates osteopathy approval. We offer our resources, partnership and support for good governance and early communication.

Recommendation 1): WorkSafe Tasmania should note Osteopathy Australia's successful profession group applications to WorkSafe Victoria, Transport Accident Commission Victoria, and NSW SIRA, and extend approval to Tasmania. This would further increase appropriate professional supply and support provider operations.

Streamlining application processes for emergent allied health professions

Our extensive experience of working with various jurisdictions affords us good insight into possible accreditation process efficiencies.

Although the HWCA has been abolished as a structure, there remains good reason for streamlining application arrangements for professions with cross jurisdictional standing (thus removing process red tape). Most jurisdictions have, for instance, predominately adopted the HWCA's Nationally Consistent Approval Framework and/or its 2019 Principles of Practice in their own separate application processes, meaning a successful application in one state or territory generally continues to suffice in another on a content level. Osteopathy Australia's general experience is as such. This point of transferability is particularly important for Tasmania as it looks to either wholly or partially adopt the HWCA 2019 Principles of Practice.

Recommendation 2): WorkSafe Tasmania should develop two clear application processes for emergent allied health professions:

Pathway 1) should be a comprehensive application process for professions that have not lodged a successful application for inclusion approval in any other jurisdiction and Tasmania is to be the entry point

Pathway 2) should be a far more streamlined application process for professions that have lodged successful applications for inclusion approval in another jurisdiction prior to applying in Tasmania. The process could comprise application exemptions or a request to review evidence from historical applications.

Adopting *Recommendation 2* would assist WorkSafe Tasmania to fulfil core goals from the terms of reference for the Tasmanian workplace rehabilitation provider accreditation project; namely: in supporting supply of qualified allied health professionals to provide workplace rehabilitation services locally and nationally by assuring the scale of the framework, including accreditation processes, can be effectively and efficiently managed by WorkSafe Tasmania staff and the Board.

References

- ⁱ Health Times, 'Osteopathy Fastest Growing Allied Health Profession' [online]; <https://healthtimes.com.au/hub/allied-health/66/news/kk1/osteopathy-fastest-growing-allied-health-profession/1097/>
- ⁱⁱ Osteopathy Board of Australia (2019), Capabilities for osteopathic practice [online]; <https://www.osteopathyboard.gov.au/Codes-Guidelines/Capabilities-for-osteopathic-practice.aspx>
- ⁱⁱⁱ Osteopathy Board of Australia, *Capabilities for Osteopathic Practice (2019)* [online]; <https://www.osteopathyboard.gov.au/Codes-Guidelines/Capabilities-for-osteopathic-practice.aspx>
- ^{iv} Comcare, 'Clinical Framework for the Delivery of Health Services' [online]; <https://www.comcare.gov.au/about/forms-publications/documents/publications/claims/clinical-framework-for-the-delivery-of-health-services.pdf>
- ^v Royal Australian College of Physicians, 'Health Benefits of Good Work' [online]; <https://www.racp.edu.au/advocacy/division-faculty-and-chapter-priorities/faculty-of-occupational-environmental-medicine/health-benefits-of-good-work>