

OSTEOPATHIC PRACTICE UNDER ALERT LEVEL 3

UPDATE as at 18 October 2021

Introduction

The Ministry of Health rules regarding the provision of health services (including osteopathy) are set out in Alert Level Requirements orders made by the COVID-19 Response Minister.

The Ministry of Health also publishes Guidance for Allied Health professions for practice during the various Alert Levels.

Mandatory requirements

Regulatory requirements

Current Alert Level requirements are set out in an [Order](#) that commenced on 21 September 2021. The Order specifies mandatory legal requirements for individuals, businesses, and services at various alert levels. Requirements for business and services include matters such as the number of customers and clients allowed in a workplace, physical distancing rules, and contact record rules.

Importantly, apart from a few specific exceptions, nothing in the current Order applies to health services (including osteopathy). In other words, the Order enables osteopaths to provide health services to the public provided they comply with those exceptions.

In summary, the exceptions require osteopaths to take the following actions:

Under all Alert Levels

- [Display of QR codes in workplaces](#) (clause 9)
- [Workplace systems and processes to enable keeping of contact records](#) (clause 11)

Under Alert Levels 2 and 3

- [Systems and processes for contact record rule](#) (clauses 28 and 44)

The person in control of a workplace of any health service must have systems and processes in place to ensure, so far as is reasonably practicable, that each person aged 12 years or older who enters the workplace—

- a. scans the QR code for the workplace or otherwise makes their own contact record; or
- b. provides a contact record that the person in control of the workplace collects

but only in relation to people other than workers of the health service.

- [Additional face covering requirements for individuals](#) (clauses 23 and 39)

Every person who is not a patient or worker of the health service must wear a face covering on the premises of the health service.



Ethical and other legal requirements

When deciding whether to provide face-to-face services where COVID-19 alert levels apply, osteopaths must consider their ethical obligations to patients. This includes Principle 3 of the [Code of Conduct](#), which states that osteopaths are expected to “work in partnership with health consumers to promote and protect their wellbeing”, as well as Standard 1.9, which states osteopaths are expected to “take steps to minimise risk and ensure your care does not harm the health or safety of health consumers.”

These principles require the osteopath to apply their clinical judgment to balance the treatment needs of the patient against the need to take appropriate steps to keep the patient, and others who may be in the workplace, safe from the risk of infection.

Always conduct a suitable risk assessment and take appropriate measures to mitigate identified risks, having regard to:

- the nature of the presentation,
- the health condition and vulnerability of the patient and others present,
- alternative treatment options
- implementation of hygiene measures such as hand sanitation, mask wearing, and room ventilation.

The risk assessment, measures taken, and clinical reasoning for decisions made should be documented in each case.

Osteopaths who are persons conducting a business or undertaking (PCBU) for the purposes of health and safety legislation should also consider their obligations to ensure, so far as is reasonably practicable, the health and safety of their workers and others who could be put at risk by the work of the business, for example customers, visitors, children and young people, or the general public.

Guidance

The Ministry of Health has recently revised the [guidelines for clinical practice for Allied Health under Alert Level 3](#).

These guidelines are intended to help practitioners determine whether a particular case warrants a face-to-face appointment given the current risk of COVID-19 transmission within the community. The Council expects that osteopaths will use these guidelines when deciding whether to offer a patient face-to-face care under the current Alert Level 3 restrictions.

These Guidelines are not mandatory; however, the Council considers them to be a useful tool in considering how an osteopath may safely practice under Alert Level 3.

What does this all mean?

The mandatory requirements identified above are the law and must be followed in all cases to which they apply.

There are no legal restrictions on whom you choose to provide osteopathic services. It is your clinical judgement whom you choose to see.

As such, osteopaths may choose to offer face-to-face appointments under Alert Level 3.

This ability to provide face-to-face services, however, also requires osteopaths to carefully consider balancing the needs of their patients with the risk of COVID-19 transmission. The ability to offer face-to-face appointments does not mean ‘routine care’, as may be possible lower Alert Levels. Each face-to-face appointment should be carefully considered using the most up-to-date guidance available.



Council reporting

As described above, osteopaths are required to maintain contact tracing records. Practitioners do not need to report face-to-face appointments or seek permission from Council.

Council is not currently intending to conduct routine audits of practitioner activity under Alert Level 3. However, Council may request information from an osteopath if there are concerns about safe practice and/or a risk of harm to the public. As part of good clinical record-keeping, osteopaths should maintain sufficient records to demonstrate their actions (including clinical decision making) to mitigate the risks related to face-to-face appointments and balance this against the needs of their patients.

Future updates

The rules relating to COVID-19 Alert Levels are not made by the Council and are constantly changing. Therefore, we should all expect further changes to be made to the rules as the COVID-19 pandemic continues to progress. We will aim to keep you informed if changes are made to the current order or other aspects of clinical care.

Disclaimer

This document provides a brief summary of the current rules as we understand them. You should refer to the Order at the link provided above and consult the Ministry of Health for more detailed information. Please note that the advice we provide is general in nature and is not a substitute for legal advice. You should seek advice from a lawyer should you wish to understand how the rules apply to your specific circumstances.



Advice: Seeing patients Alert Level 3 / Step 1

Last updated 15/10/21

Osteopaths use their clinical judgement and reasoning when considering seeing a patient face-to-face for a consultation based on current guidance. The following advice may be useful in developing protocols for mitigating the risk of face-to-face appointments, but osteopaths should ensure they consider any further actions that may be necessary and/or appropriate to protect public health.

Advice for face-to-face contact appointments

1. Risk Assessment and Screening

[Screen and risk assess](#) patients and any support persons (if required) for risk of COVID-19 prior to face-to-face consultations. Patients should be screened when booking the appointment and then re-screened when they arrive at the clinic, or you arrive at their place of residence.

See: Ministry of Health [Case definition and clinical testing guidelines for COVID-19](#) or **Clinical criteria and Higher Index of Suspicion (HIS)** criteria in the [Primary care quick reference guide](#)

When making an appointment for a face-to-face consultation, advise patients that if they do develop symptoms between booking and attending their consultation, they must call to cancel the face-to-face consultation and seek medical advice.

Document in the patient clinical record the clinical decision on whether to see a patient face-to-face or otherwise.

2. Pre preparation

- osteopath and practice staff/contractors are encouraged to be fully vaccinated (note: mandatory vaccination Order yet to be finalised by Parliament)
- have knowledge of current Health and Safety procedures and guidance from Ministry of Health including [‘advice for all health professionals’](#)
- have a plan in place for your premises e.g., identifying which door patients will enter and leave from
- [select PPE](#) as recommended by Ministry of Health, source PPE and retrain staff on its use, including donning, removing and disposing of PPE
 - Patients and practitioners should both wear a mask unless exempted
- have cleaning materials and PPE sourced and in stock at the clinic
- cleaning plan developed and implemented
- all osteopaths and support staff retrained in new clinic procedures and all procedures provided to them
- ensuring meeting the physical distancing requirements where required
- set up a register of all people who have been in the clinic/service with current contact details confirmed such as staff members, delivery/pick up personnel and cleaning staff, in case contact tracing is later required.

3. Preparation

- patient and required support person and those in their bubble whānau screened for COVID-19 signs or symptoms by phone or telehealth prior to offering a consultation in the clinic.
- when making the appointment give clear instructions to patients regarding where to come, what to expect when they arrive, and how things differ from their usual visits
- you must have and use [a QR code for your place of work](#)
- ensure appropriate PPE is in place ready to be used (all staff to be retrained as above)



- have one practitioner using one room per shift
- limit points of entry to the clinic – preferably patients can enter one door and leave from another
- all unnecessary items should be removed from the waiting room and surfaces kept clear and clean, including excessive furniture, waste bins, water coolers etc.
- areas of known contamination should be cleaned and disinfected
- make it clear at the entrances that no walk-in appointments off the street are available.

4. During visit

- patient and, if required, support person and bubble whānau again screened for any COVID-19 signs or symptoms prior to entering the clinic
- if visiting a patient at place of residence scan in using the QR code or record your visit details within your management system
- require patient, and others, to scan QR code and hand sanitise on arrival and sanitise on departure from the clinic
- osteopaths fill out any paperwork and forms for the patient (sign with cleaned pen) – if possible, use contactless methods
- if possible, allow only the patient to be present for the consultation
- confirm contact details for the patient and each person accompanying the patient and inform them that these details may be used for contact tracing, if required
- maintain physical distancing where possible, for instance, during the subjective examination
- follow PPE protocol as advised by the Ministry of Health
- minimise close contact time
- follow all hand and hygiene practices
- keep doors and windows open, ventilation systems on (open doors to the clinic; treatment room doors also open if possible)
- minimise the use of equipment (such as pillows, for instance) which are not easy to clean or replace. Alternatively use single-use coverings for pillows and plinths such as towels or paper towels.

5. Post visit

- clean all equipment, pillows and plinths after each patient contact
- clean keyboard, mouse and computer screens after each patient contact
- carry out correct steps for safe removal and disposal of PPE
- follow cleaning protocol – wiping down all hard surfaces with detergent and hot water and then use a disinfectant
- appropriate PPE should be worn for cleaning the room
- PPE and waste should be disposed in a closed clinical waste bin and in accordance with clinical waste requirements
- ventilate room. Ensure there is sufficient time between appointments to allow fresh air flow, or consider using alternate rooms for subsequent appointments

6. End of shift

- Osteopath showers (if possible), changes clothes and shoes at workplace
 - alternatively, the osteopath showers at home, cleans the shower before contacting anyone in their home bubble whānau and hot washes their clothes and towels etc.
- Osteopath leaves clinic through different doors if possible (the clean side of clinic)
- Ensure door handles, keys and high touch surfaces are cleaned before leaving.



Further resources

Ministry of Health:

- [Ministry of Health guidance for Community Allied Health Scientific and Technical Providers in Alert Level 3](#)
- [COVID-19 Risk Assessment – Alert Level 3 & 4](#)
- [Case definition and clinical testing guidelines for COVID-19](#)
- [Primary care quick reference guide](#)
- [Personal Protective Equipment \(PPE\) requirements](#)
- [Donning and removing PPE](#)
- [Advice for all health professionals](#)
- [General cleaning information following a suspected, probable or confirmed case of COVID-19](#)

