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"Clouding the Issues" - Concerns of The Society of Sports Therapists regarding developments in Voluntary Regulation

As the lead professional body for Sports Therapy in the United Kingdom, **The Society of Sports Therapists** is extremely concerned about developments that have been brought to its attention, regarding the formation of a group called the Sports & Remedial Therapy Council (SRTC), which has recently been established under the auspices of the Complementary & Natural Healthcare Council (CNHC). Such concerns were further heightened at a meeting held between three Directors of **The Society of Sports Therapists** and representatives of the CNHC and SRTC.

The CNHC purport to be a regulatory body approved by the Department of Health (DoH). CNHC was formed in 2007 from a working group that had been established following a House of Lords recommendation in 2002 to look at the regulation of Complementary and alternative medicine within the United Kingdom. It is also our understanding that another group called the General Regulatory Council for Complementary Therapy (GRCCT) was also established following the working group and prior to the formation of CNHC. Research has subsequently indicated that both groups are in direct competition and that there is open animosity between them.

What has heightened the concerns of **The Society of Sports Therapists** is that CNHC has recently decided that it should include Sports Therapy within its remit and that it is the self proclaimed "lead body" for Sports Therapists. As such, they have formed a group called the Sports & Remedial Therapy Council (SRTC) and are openly advertising that this is the "government approved" register for Sports Therapists. Members of their Council are also making adverse statements regarding **The Society of Sports Therapists'** application to the Health Professions Council (HPC) which was made in 2006. At that time, the HPC was minded to recommend that, "for the protection of the public, Sports Therapists should be regulated". This recommendation was sent to the Secretary of State for Health but, as with 5 other professions which have had similar decisions made between 2001 and 2006, the process has gone no further towards the final stages of Statutory Regulation.

Consequently, **The Society of Sports Therapists** is extremely concerned that the CNHC, which was established in 2007, (the year **after** the application for Statutory Regulation had been considered and decided upon by the Health Professions Council), formed another group (SRTC) in 2009 which now purports to be both the "lead body for Sports Therapists" and the government approved organisation. What is more concerning, confusing and alarming is that CNHC was originally part of a working group to look at Complementary and alternative medicine.

At the recent meeting, referred to above, the Officers of **The Society of Sports Therapists** posed a series of questions to representatives of the SRTC and CNHC attending, to try to clarify and determine some information regarding the history, background, philosophies and constitution of both "Councils". The responses given did nothing to alleviate the Society's concerns and the following are the key points which have necessitated **The Society of Sports Therapists** writing and circulating this statement:

1. The CNHC evolved from a working group whose mandate was to look at Complementary healthcare. The working group (the Federal Working Group) was set up in January 2007 after the House of Lords had in 2002 recommended that practitioners of Complementary healthcare should be registered and regulated. Apparently, there were representatives from 12 therapy areas on the working group which was supported and part funded by the Princes Foundation for Integrated Health, the Kings Fund and the Department of Health. The aim of this group was to make proposals for the voluntary self regulation of Complementary healthcare which would include a single register of Complementary therapists. Following a consultation process the General Regulatory Council for Complementary Therapy (GRCCT) was launched in late 2007. It is then understood that the CNHC was formed after that under the facilitation of the Foundation for Integrated Health (FIH). Sports Therapy was **not** in the remit of the Federal Working Group nor the regulatory bodies subsequently established. More importantly, it was not **in the original remit of CNHC**.
2. Sports Therapists had already been considered for Statutory Regulation by the Health Professions Council following the application made to it by **The Society of Sports Therapists**. Moreover, whilst the recommendation also required **The Society of Sports Therapists** to undertake some other work related to scope of practice and support, the overriding requirement for the public to be protected had been established and, as such, a recommendation was sent to the Secretary of State confirming this **in May 2006**.
3. Sports Therapy is a profession with its own distinct body of knowledge and defined standards of education and training, which are clearly based around competencies written and set by **The Society of Sports Therapists**, the recognised lead professional body for Sports Therapy within the United Kingdom. The Society has a status and recognition that can be confirmed by the position that the Society has both politically and with leading sports governing bodies. The breadth of competency requirements and core skills extends from sports trauma management through to final functional and sport specific rehabilitation. Moreover, whilst the Society acknowledges that there may be practitioners from other disciplines who undertake some "Sports Therapy" within a clinical or Complementary healthcare environment, it **does not** mean that they are "**Sports Therapists**". It is only those practitioners who have trained and been educated through the full spectrum of the core competencies, who can be deemed as meeting the professional and academic standards that **The Society of Sports Therapists** would require, or recommend, for registration.
4. Sports Therapy is **not** Complementary Therapy. Complementary Therapy is defined as being made up of Therapies that offer a variety of "Complementary" treatments outside the scope of conventional medical practice, and often used alongside standard treatments. Examples include the use of Nutritional Supplements, Herbal Remedies, Acupuncture and "energy work" etc. None of these "modalities" fall within the scope of practice of a "Sports Therapist" – a practitioner who follows a clearly defined scope of practice that is conventional and evidence based. Consequently, Sports Therapy cannot and should not be regulated or represented by a Complementary & Natural Healthcare Council.
5. **The Society of Sports Therapists** is extremely concerned that those who purport to represent Sports Therapy within CNHC and SRTC do not fully understand what a Sports Therapist is or does. To be told at the meeting that "1200 poolside attendants and gym staff want to register with SRTC as Sports Therapists", and that it is being considered, is both horrifying and shows ignorance of what is required to be a registered Sports Therapist.
6. The representatives of SRTC and CNHC also indicated that the majority of the members on their register are masseurs or Complementary therapists who happen to treat sports people with injuries or problems. Once again, whilst they may be undertaking some aspects of Sports Therapy this does not make them Sports Therapists.
7. CNHC states that it is a regulatory body that holds a voluntary register of practitioners that it approves. However, as a "regulator" it does not approve courses or undertake a process whereby applicants to be registered are assessed and vetted by it. Apparently, any applicant to CNHC who is a member of a professional body that has linked itself to the organisation will "automatically" be admitted to the register. Similarly, anyone applying through a Grand-Parenting or APEL route will have their application approved by an appropriate professional body rather than the vetting being

undertaken independently by CNHC. This, in itself, causes concerns. It is the understanding of **The Society of Sports Therapists** that one of the main recommendations in the recent White Paper 'Trust Assurance and Safety – The Regulation of Health Professions in the 21st Century' was that professional body involvement in the regulatory process should be reduced considerably. Consequently, the regulator should be the organisation that makes decisions on applicants rather than the Professional Body to whom that practitioner may belong. Therefore, **The Society of Sports Therapists** does not believe that CNHC is actually fulfilling the role for which it continually states it was established to do, or does.

8. With regard to course approval, the Society has major concerns that CNHC and SRTC does not have the necessary knowledge, manpower and/or experience to regulate and monitor the delivery and assessment of the practical profession specific components, across the range of private and Further Education institutions that are currently delivering Sports Therapy. If the profession (industry) specific components are not monitored for quality then it will only be a matter of time before inappropriate and/or unsuitably qualified therapists are registered under the auspices of CNHC. Conversely, **The Society of Sports Therapists** monitors vigorously the practical and professional components of the courses that it accredits, notably all of the graduate programmes in Sports Therapy.
9. CNHC and SRTC continually referred to National Occupational Standards (NOS) in Sports Therapy as being their benchmark. The Society finds both the reference to National Occupational Standards and the fact that it has not been consulted previously about these, both confusing and concerning. The Society has written evidence from SkillsActive, dated July 2008 which clearly states that they (Skills Active) "*would not approve or consider any qualifications in Sports Therapy (except sports massage) without speaking to **The Society of Sports Therapists** first*". SkillsActive recognised that there will be aspects of Sports Therapy above level three but, because their remit is to develop NOS at level three, those modules which are deemed above that level will not be written. SkillsActive stated "*If we (SkillsActive) decide the learning required to achieve the units is above level 3 then it is unlikely there will be any vocational qualifications, not least because there is no public funding for vocational qualifications above Level 3. Sports Therapy being a graduate profession and being regulated at that level will also ensure awarding bodies do not develop qualifications in this area. If qualifications are ever developed, no units will ever be taught in isolation unless we (you) [The Society of Sports Therapists] agree it is appropriate.*" It is clear that this is exactly what CNHC are attempting to do. They are taking the lowest units out of the full Sports Therapy qualification and parading them as the full qualification. This constitutes a grave danger to the public.

SkillsActive recognised Sports Therapy as "*being a Graduate profession and being regulated at that level*". SkillsActive went on to say "*the educational routes to getting to the level to be able to perform these skills needs to be regulated. We see the Society of Sports Therapists as the body to do this through it's HE accreditation scheme – the NOS will not be a hindrance to this*". Therefore, where do CNHC AND SRTC get their information from regarding their own authority with National Occupational Standards? Also, are they confusing themselves and everyone else by thinking that "sports massage is Sports Therapy?" Whatever, SkillsActive do not agree.

10. The Society was also informed that the CNHC was working closely with a well known Member of Parliament on the regulation of Therapists on its register (including Sports Therapists) to work at the 2012 London Olympics. However, since attending the meeting and asking the MP concerned about specific involvement with CNHC, the Society was informed that the information given to it relating to this matter was blatantly untrue. The MP in question has had no such conversations with these groups regarding the Olympics or sport in any way at all!

In its application to the Health Professions Council, **The Society of Sports Therapists** recommended that Statutory Regulation for Sports Therapists should be at a Graduate level. This ensures a benchmark of both quality assurance at an academic level and a registration entry point that is comparable to other professions already regulated by the HPC. The CNHC and SRTC have indicated that they want regulation to be on a voluntary basis and at a level that is significantly inferior to that recommended by **The Society of Sports Therapists**. To recommend registration at a lower level confuses the situation further and causes major difficulties with regard to benchmarking the standards of education at a comparable level to professions that are already regulated. More importantly, the

Youth Sport Trust, Scottish Football Association, English Football Association and Rugby Football Union have all acknowledged Graduate Sports Therapists as the level that they are happy to recognise and work with. The Graduate status negates any confusion.

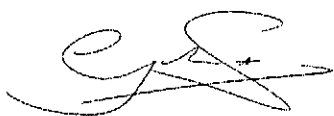
The Society of Sports Therapists was established in 1990. It has a membership database which is, in reality, a "voluntary register". Members apply on an annual basis to join/rejoin and are required to meet specific criteria before they are readmitted to the "register". It is not an automatic renewal process. As such, it is an annual requirement to "voluntarily register" as a member.

Recent incidents have also shown that, without regulation, anyone can call themselves a Sports Therapist. Furthermore, if the practitioner is excluded or expelled from membership of **The Society of Sports Therapists** their right to practise is not affected; only their status as a member of **The Society of Sports Therapists**. Practitioners can be found guilty of a criminal or professional offence and removed from the membership register. However, sadly, they are still allowed to practise as a Sports Therapists because no government organisation regulates their right to call themselves by the occupational title "Sports Therapist". It is for this and the other reasons outlined above that Sports Therapists must be regulated by the Health Professions Council under Statutory Regulation and not by a voluntary body such as CNHC that is primarily an organisation for Complementary healthcare practitioners. Moreover, the CNHC is an organisation that already has conflict with another group from within its own professional sphere.

The concerns raised in the above document following the meeting between Directors of **The Society of Sports Therapists** and representatives of SRTC and CNHC, along with the false and inaccurate information that is being circulated by representatives of these Complementary therapy organisations, illustrates why Sports Therapy must be regulated soon. More importantly, it must be regulated under the governance of the Health Professions Council at a Graduate level.

The Society of Sports Therapists acknowledges that, in pushing for this regulation to take place, it may be detrimental to its own survival and existence – points that were also raised in the formal application to the Health Professions Council in 2006. However, notwithstanding this, the protection of the public from unregulated and inappropriately trained Sports Therapists is paramount, and are aims that the Society has clearly stated in everything that it has done previously with regard to Statutory Regulation. It also went through a lengthy application process to the HPC which was heard and duly considered before either the CNHC or SRTC were even formed.

In conclusion, the Society believes that CNHC should retract from any involvement in Sports Therapy with immediate effect and publicly announce this move. The Society would also strongly urge that the CNHC recognises the potential that there is for harm within the scope of practice for Sports Therapists and agrees that the HPC has a duty to regulate this profession at a Graduate level. **The Society of Sports Therapists** would also urge the CNHC to publicly announce that it supports this level of entry to the register. If these recommendations were to be undertaken by CNHC, the potential for increasing levels of confusion, both for the public and within the Sports Therapy profession, would be negated. More importantly, those individuals who are required to push the Statutory Regulation process forward would see that everyone involved in any aspect of "Sports Therapy" speaks with a united voice which should be listened to and acted upon immediately. The time for delay to this process has passed. The public is still at risk and the only way that this can be diminished is by regulating Sports Therapists under the statutory mechanisms that are in place to do this.



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Chairman
for The Society of Sports Therapists