

Consultation on draft guideline – deadline for comments **5pm** on **5 May 2016** email: LBPUpdate@nice.org.uk

		Please read the checklist for submitting comments at the end of this form. We cannot accept forms that are not filled in correctly.					
		 We would like to hear your views on these questions: Do any recommendations represent a substantial increase in costs, and do you consider that the reasons given in the guideline are sufficient to justify this? Which areas will have the biggest impact on practice and be challenging to implement? Please say for whom and why. What would help users overcome any challenges? (For example, existing practical resources or national initiatives, or examples of good practice.) See section 3.9 of Developing NICE guidance: how to get involved for suggestions of general points to think about when commenting. 					
Stakeholder organisation(s) (or your name if you are commenting as an individual):		[Complementary and Natural Healthcare Council (CNHC)]					
Name of commentator (leave blank if you are commenting as an individual):		[Michael Watson], Chair, CNHC					
Comment number	(full version1, full version 2 short version or the appendices)	Page number Or 'general' for comments on the whole document	Line number Or 'general' for comments on the whole document	Comments Insert each comment in a new row. Do not paste other tables into this table, because your comments could get lost – type directly into this table.			
1	Short	5	2-3	We are pleased to see that massage remains in the guidelines, albeit only as part of a multi-treatment package.			



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2	Short	5	2-3	Question 3: We recommend that to ensure good practice, only massage therapists registered with an Accredited Register such as the Complementary and Natural Healthcare Council (CNHC) are used. The Accredited Register Programme is a government-backed programme to accredit voluntary registers and is a guarantee of standards. All practitioners on CNHC's Accredited Register have met UK wide standards, hold professional indemnity insurance, abide by a strict Code of Conduct, Ethics and Performance and must take part in CPD each year. For more details see www.professionalstandards.org.uk . For more details of CNHC see www.cnhc.org.uk
3	Short	5	6-7	Although not directly within our remit, we are disappointed to see that recommendation 1.2.8 proposes not offering acupuncture. It appears that NICE has focused on studies which compare acupuncture to sham acupuncture, rather than to other treatments, and so has made a decision based on an assessment of efficacy rather than effectiveness. We suggest NICE reviews this approach and includes a continued recommendation for acupuncture, prior to publishing the final guideline.
4	Short	5	24 - 27	Question 1: We are pleased to see that yoga is included in the recommendations for combined physical and psychological programmes. We agree that the group approach would suggest a cost-effective way to address low back pain.
5	Short	5	24-27	Question 3: As in our comments 2 above we recommend that practitioners selected are yoga therapists registered with CNHC's Accredited Register.
6	Full – Part 1	331	25	In relation to the Alexander Technique, we were pleased to see that the GDG recognised promising results for use of Alexander Technique lessons to support people with low back pain. However, we were disappointed to see that the GDG made no recommendation for further research. The rationale provided was that further research was already being planned as a possible follow-up to the ASPEN feasibility study. However, no such trial has been funded, and so, given the promising initial findings, it would seem to be in the interest of those with low back pain to recommend further research.
7	Full – Part 1	308	3, 7-8, 11-14, 21	We note that NICE has categorised the Alexander Technique as a 'postural therapy'. However, in our work with the Alexander Technique teaching profession we have come to understand that it is in fact a taught approach to improving functioning (including of postural support mechanisms), movement, response to stimuli and breathing. There may be a positive impact of Alexander lessons on posture but it is not a postural therapy as such. We therefore support the comments submitted by the Society of the Teachers of the Alexander Technique about this issue.
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Insert extra rows as needed

Checklist for submitting comments

- Use this comment form and submit it as a Word document (not a PDF).
- Include page and line number (not section number) of the text each comment is about.
- Combine all comments from your organisation into 1 response. We cannot accept more than 1 response from each organisation.
- Do not paste other tables into this table type directly into the table.
- Underline and highlight any confidential information or other material that you do not wish to be made public.
- Do not include medical information about yourself or another person from which you or the person could be identified.
- Spell out any abbreviations you use
- For copyright reasons, comment forms do not include attachments such as research articles, letters or leaflets (for copyright reasons). We return comments forms that have attachments without reading them. The stakeholder may resubmit the form without attachments, but it must be received by the deadline.

You can see any guidance that we have produced on topics related to this guideline by checking NICE Pathways.

Note: We reserve the right to summarise and edit comments received during consultations, or not to publish them at all, if we consider the comments are too long, or publication would be unlawful or otherwise inappropriate.

Comments received during our consultations are published in the interests of openness and transparency, and to promote understanding of how recommendations are developed. The comments are published as a record of the comments we received, and are not endorsed by NICE,



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its officers or advisory Committees.