

REGULATED MASSAGE THERAPISTS OF IRELAND

POLICIES AND AGREEMENTS

© Regulated Massage Therapists of Ireland Limited (RMTI). 14 Main Street Swords, Co. Dublin. Register Number: 824305.

1. Child Safeguarding standard 4

1.1. Purpose and application 4

Review 7

2. Client Care, Consent & Confidentiality Standards 8

2.1. Purpose and application 8

Responsibility for compliance 10

3. RMTI Code of Professional Conduct & Ethics 11

3.1. Purpose of this Code 11

Irish legal and regulatory references for review 14

4. Complaints & Concerns Procedure 16

4.1. Purpose 16

Operational principle 18

5. RMTI Continuing Professional Development (CPD) Policy 19

5.1. Purpose 19

CPD Principle 22

6. Continuing Registration & Renewal Policy 23

6.1. Purpose 23

Continuing Registration Principle 25

7. Governance & Independence Framework 26

7.1. Purpose 26

Governance Principle 28

8. Professional Conduct & Disciplinary Procedure 29

8.1. Purpose 29

Professional Conduct Principle 33

9. RMTI Professional Insurance Requirements 34

9.1. Purpose 34

Professional Insurance Principle 36
10. Qualification Verification Policy 37
10.1. Purpose 37
Qualification Verification Principle 40
11. Records & Data Protection Standard 41
11.1. Purpose 41
Review 44
12. RMTI Register & Registration Status Policy 45
12.1. Purpose 45
Registration principle 48
13. RMTI Registration & Qualification Standards 49
Registration Principle 54

Copyright

© 2026 Regulated Massage Therapists of Ireland Limited (RMTI). All rights reserved.

This publication has been developed by the directors of Regulated Massage Therapists of Ireland Limited. The authors assert their right to be identified as the creators of this original work.

No part of this publication may be reproduced, distributed, stored or transmitted in any form or by any means without the prior written permission of Regulated Massage Therapists of Ireland Limited, except as permitted by applicable copyright law.

Disclaimer

This publication sets out the professional standards, policies and expectations established by Regulated Massage Therapists of Ireland Limited (RMTI).

These standards have been developed with reference to established professional practice, relevant Irish legislation and applicable national and international guidance.

While RMTI endeavours to ensure that the information is accurate and reviewed periodically, legislation, regulatory requirements and professional guidance may change.

Individual members remain responsible for ensuring that their professional practice complies with all applicable Irish legislation, professional obligations and RMTI membership requirements.

Regulated Massage Therapists of Ireland Limited, its directors, officers and representatives accept no responsibility for a member's failure to comply with their individual legal or professional obligations. Nothing in this disclaimer excludes or limits any liability that cannot lawfully be excluded.

1. CHILD SAFEGUARDING STANDARD

1.1. PURPOSE AND APPLICATION

RMTI is an independent professional association for qualified massage therapists in Ireland, operating through a framework of voluntary professional self-regulation. This Child Safeguarding Standard sets the expectations for RMTI members and registered therapists who provide massage therapy or reflexology to children and young people. It forms part of RMTI's commitment to supporting professional practice, maintaining accountability and protecting public confidence. It does not replace obligations arising under Irish law or Children First guidance.

For this Standard, a child means a person under 18 years of age.

1.2. Core safeguarding principles

When working with a child, the therapist must place the child's welfare and safety first and practise in a way that is transparent, respectful and appropriate to the child's age, understanding and circumstances.

1. Treat the child with dignity and respect and listen to their views and concerns.
2. Provide information in language the child can understand.
3. Never use pressure, coercion, secrecy or inappropriate familiarity to obtain cooperation.
4. Maintain clear professional boundaries and avoid conduct that could reasonably be misunderstood or place the child or therapist at unnecessary risk.
5. Take reasonable action where a child's safety or welfare gives rise to concern.

1.3. Consent, assent and the child's participation

The therapist must establish an appropriate legal basis for consent before treating a child and must involve the child meaningfully in decisions about their care.

1. Obtain parent or guardian consent where this is required by law or appropriate to the child's age and circumstances.
2. Explain the proposed treatment, areas to be treated, expected benefits, relevant risks or discomforts and the child's choices in an age-appropriate way.
3. Seek the child's affirmative agreement or assent wherever they are able to participate in the decision.
4. Respect signs that the child is uncomfortable, unwilling or wants treatment to stop, even where a parent or guardian has consented.
5. Reconfirm consent and the child's willingness where the treatment plan, technique, body area or circumstances change.

A parent or guardian's wish for treatment does not remove the therapist's responsibility to consider the child's own wishes, welfare and capacity to participate. Where consent or authority is unclear, treatment should be postponed until the position is clarified.

1.4. Parent or guardian involvement

The therapist should agree in advance how a parent or guardian will be involved in the appointment, taking account of the child's age, maturity, wishes, privacy and safeguarding needs.

1. For younger children, a parent or guardian should normally remain present or immediately available unless there is a clear and appropriate reason otherwise.
2. For older children and teenagers, privacy may be appropriate in some circumstances, but arrangements must remain professionally defensible and consistent with safeguarding, consent and applicable law.
3. Any request to exclude a parent or guardian should be considered carefully. The therapist should not proceed where the circumstances create uncertainty about safety, consent or professional boundaries.
4. The therapist should document significant decisions about parent or guardian presence where relevant.

1.5. Safe treatment, touch, privacy and draping

Massage therapy involves physical touch and may involve changing clothing or draping. These features require particular care when the client is a child.

1. Explain clearly, before treatment, what touch is proposed and which body areas will be involved.
2. Use only touch that is professionally appropriate, clinically relevant to the treatment being provided and within the therapist's competence and scope of practice.
3. Protect the child's physical privacy during changing, positioning and treatment.
4. Use appropriate clothing and draping so that only the area being treated is exposed as necessary.
5. Do not ask a child to undress beyond what is reasonably required for the agreed treatment.
6. Avoid unnecessary treatment of sensitive areas. Where treatment near a sensitive area is professionally justified, use heightened consent, communication, draping and boundary safeguards.
7. Stop or modify treatment immediately if the child shows discomfort, distress or withdrawal of agreement.

1.6. Communication and professional boundaries

The therapeutic relationship with a child must remain clearly professional. Communication, including digital communication, should be appropriate, transparent and connected to the professional service being provided.

1. Do not sexualise treatment, make sexual comments or engage in sexualised behaviour.
2. Do not encourage secrets between the therapist and child.
3. Avoid private or informal communication channels that bypass reasonable parent, guardian or practice safeguards.
4. Do not photograph, record or publish images or information about a child without an appropriate lawful basis and the necessary permissions.
5. Do not use gifts, special treatment or personal contact in a way that creates dependency, secrecy or blurred boundaries.

1.7. Recognising and responding to safeguarding concerns

Therapists must remain alert to information, behaviour, injuries, disclosures or circumstances that may give reasonable grounds for concern about abuse, neglect or a child's welfare. It is not the therapist's role to prove that abuse has occurred.

Where there are reasonable grounds for concern that a child may have been, is being, or is at risk of being abused or neglected, the therapist should follow Children First guidance and report the concern to Tusla as appropriate. If a child appears to be in immediate or serious danger and Tusla cannot be contacted, An Garda Síochána should be contacted without delay.

A therapist who is also a mandated person because of another professional role must comply with the additional statutory duties attaching to that role.

1.8. Responding to a disclosure

If a child discloses abuse or harm, the therapist should respond calmly and sensitively.

1. Listen carefully and take the child seriously.
2. Reassure the child that speaking about the concern was the right thing to do.
3. Do not promise secrecy or absolute confidentiality.
4. Ask only questions needed to clarify what the child is saying; do not use leading questions or attempt to investigate.
5. Do not confront the person alleged to have caused harm.
6. Explain, in an age-appropriate way, that the information may need to be shared to help keep the child safe.
7. Make a factual written record as soon as possible, distinguishing what the child said from the therapist's own observations.
8. Follow the appropriate reporting or referral route without unnecessary delay.

1.9. Confidentiality, information sharing and records

Information about a child must be handled confidentially, but confidentiality is not absolute where safeguarding or legal duties require information to be shared.

1. Share safeguarding information only with those who need it for a legitimate safeguarding, legal or professional purpose.
2. Keep records factual, accurate, dated and securely stored.
3. Record the basis for significant safeguarding decisions and any report or referral made.
4. Do not promise a child or parent that safeguarding information will remain confidential where this cannot properly be guaranteed.

Detailed requirements for record keeping and data protection are addressed in the RMTI Records & Data Protection Standard.

1.10. Children First Act 2015 and relevant services

Under Schedule 1 of the Children First Act 2015, treatment, therapy or counselling provided to a child is a relevant service. The Act places specific duties on a "provider of a relevant service", as defined in the Act. This definition generally captures a person or organisation providing the service who employs, contracts with, or permits one or more other people to undertake the relevant service on their behalf.

Where an RMTI member or their practice is a provider of a relevant service within the meaning of the Act, they must meet the applicable statutory requirements. These include, as relevant, keeping children safe from harm while using the service, carrying out a risk assessment, preparing a Child Safeguarding Statement and appointing a relevant person.

A sole practitioner should not assume that all organisational duties under Part 2 of the Act apply to them solely because they treat a child; equally, a practice should not assume it is outside the Act without considering its staffing, contracting and service arrangements. Members are responsible for understanding the legal duties that apply to their own practice structure.

1.11. Safeguarding arrangements within a practice

Members who operate or work within practices providing services to children should ensure that safeguarding arrangements are proportionate to the service and meet any legal requirements that apply.

1. Know how safeguarding concerns are reported within the practice and to Tusla.

2. Know who is responsible for safeguarding decisions and, where applicable, who is the relevant person under the Child Safeguarding Statement.
3. Ensure staff, contractors, students or others working with children understand the safeguarding procedures relevant to their role.
4. Consider safeguarding risks associated with the physical environment, lone working, changing areas, digital communication, photography, records and online activity.
5. Review safeguarding arrangements when services, staffing or risks materially change.

1.12. Concerns about an RMTI member

RMTI may take proportionate steps within its own professional framework where a safeguarding concern raises a question about a member's professional conduct, suitability for continued membership or registration, or compliance with RMTI standards. Where a breach is established, outcomes may include appropriate sanctions, suspension or removal from membership and the professional register, in accordance with RMTI's applicable procedures and principles of fairness and due process.

1.13. Related standards and guidance

1. RMTI Code of Professional Conduct & Ethics
2. RMTI Client Care, Consent & Confidentiality Standards
3. RMTI Scope of Practice & Professional Boundaries
4. RMTI Complaints & Concerns Procedure
5. RMTI Professional Conduct & Disciplinary Procedure
6. RMTI Records & Data Protection Standard
7. Children First Act 2015
8. Children First: National Guidance for the Protection and Welfare of Children 2017, as updated
9. Tusla Children First guidance and reporting resources

REVIEW

RMTI should review this Standard periodically and when there is a material change in Irish safeguarding law, Children First guidance, Tusla guidance or professional practice relevant to massage therapy and reflexology.

2. CLIENT CARE, CONSENT & CONFIDENTIALITY STANDARDS

2.1. PURPOSE AND APPLICATION

RMTI is an independent professional association for qualified massage therapists in Ireland, operating through a framework of voluntary professional self-regulation. RMTI members and registered therapists must place the client's welfare, dignity, autonomy and privacy at the centre of professional practice. These standards support safe, respectful and professional client care, helping therapists practise confidently and responsibly while protecting clients and the standing of the profession. They apply throughout the professional relationship, from initial enquiry and consultation through treatment, record keeping, referral and the end of care.

2.2. Client-centred care

Therapists must treat each client with dignity, respect and consideration and communicate in a way the client can understand.

1. Provide clear information about the proposed treatment and what it involves.
2. Take account of relevant health information, client preferences and individual circumstances.
3. Give the client reasonable opportunity to ask questions and make decisions without pressure.
4. Respect a client’s decision to decline, pause or stop treatment.
5. Adapt communication where reasonably necessary to support understanding and participation.

2.3. Informed and voluntary consent

Consent is an ongoing process, not simply a signed form. Before treatment, the therapist must be satisfied that the client has received enough relevant information to make a voluntary and informed decision.

1. Explain the nature and purpose of the proposed treatment.
2. Explain relevant foreseeable risks, discomforts or limitations where appropriate.
3. Explain reasonable alternatives within the therapist’s role, including postponing or declining treatment.
4. Check that the client has understood sufficiently to make the decision.
5. Obtain consent before treatment begins and again where the treatment changes materially.

2.4. Right to refuse or withdraw consent

A client may refuse treatment or withdraw consent at any time. The therapist must respect that decision and stop or modify treatment as appropriate.

Consent to one treatment, body area or technique must not be treated as consent to another. Particular care is required where treatment involves sensitive areas, changes in draping or a technique that may reasonably require additional explanation.

2.5. Consent and decision-making capacity

Adults should be presumed capable of making their own decisions unless there is a reason to question capacity in relation to the particular decision at the particular time. Therapists should support clients to understand 2.information and communicate their wishes wherever possible.

Where there is uncertainty about a client’s ability to give valid consent, the therapist must act cautiously, remain within their competence and comply with applicable Irish law and guidance. Treatment should not proceed merely because another person is present or describes themselves as next of kin.

2.6. Children and young people

Treatment of children and young people requires additional safeguarding and consent considerations. Therapists providing services to children must comply with applicable Irish child safeguarding requirements, including the Children First Act 2015 and relevant Tusla guidance.

RMTI will maintain a separate Child Safeguarding Standard/Policy. These client-care standards do not replace that policy.

2.7. Privacy, dignity and draping

Therapists must protect the client's physical privacy and dignity throughout consultation and treatment.

1. Explain clothing and draping arrangements before treatment where relevant.
2. Use appropriate draping and expose only the area reasonably necessary for treatment.
3. Provide reasonable privacy for changing.
4. Seek specific agreement before any change that may affect the client's privacy or comfort.
5. Respect requests for a chaperone where reasonable and appropriate.

2.8. Confidentiality

Information obtained through the professional relationship must be treated as confidential. Therapists must not disclose identifiable client information without an appropriate basis for doing so.

1. Discuss client information discreetly and only where necessary for legitimate professional purposes.
2. Do not discuss clients casually, including on social media or in circumstances where they may be identified.
3. Take reasonable steps to prevent unauthorised access to paper and electronic records.
4. Where information is shared for referral or coordinated care, share only what is necessary and explain the process to the client where appropriate.

2.9. When confidentiality may be limited

Confidentiality is not absolute. Information may need to be disclosed where required by law, where the client has authorised disclosure, or where another lawful basis permits or requires disclosure, including appropriate safeguarding or serious public-protection circumstances.

Where possible and appropriate, the therapist should explain the disclosure to the client and limit information shared to what is necessary.

2.10. Client information and data protection

Client records commonly contain health information and other sensitive personal data. Therapists must handle personal data in accordance with applicable data-protection law, including the GDPR and Data Protection Act 2018.

1. Collect only information reasonably required for legitimate professional purposes.
2. Have an appropriate lawful basis for processing personal data and, where relevant, an Article 9 condition for special-category data.
3. Keep information accurate, appropriately secure and no longer than necessary.
4. Provide clients with appropriate information about how their data is used.
5. Respond appropriately to data-access and other data-protection rights.

2.11. Client records

Therapists must maintain clear, accurate and proportionate records appropriate to their practice. Records should support continuity of care, professional accountability and, where necessary, review of the treatment provided.

1. Relevant consultation and health information.
2. Treatment provided and relevant observations.
3. Material consent discussions or changes in consent.
4. Advice, referral or follow-up where relevant.
5. Any significant incident, concern or disclosure relevant to professional care.

Detailed retention periods and operational requirements should be set out in a separate RMTI Records & Data Protection Standard rather than fixed in this document.

2.12. Photography, recordings and testimonials

Photographs, video, audio recordings, case material and testimonials involving a client require particular care. Therapists must obtain appropriate permission before creating or using identifiable client material and must make clear how it will be used.

Consent to treatment does not constitute consent to photography, recording, marketing or publication. A client must be free to decline without affecting their care.

2.13. Communication with third parties

Therapists should not disclose client information to family members, employers, coaches, insurers or other third parties simply because those parties request it. The therapist must establish an appropriate basis for disclosure and share only information relevant to the purpose.

2.14. Referrals and communication with other professionals

Where referral or communication with another professional is appropriate, the therapist should explain this to the client and ensure information sharing is lawful, necessary and proportionate. The therapist must remain within their own scope of practice and should not present referral information as a diagnosis outside their competence.

2.15. Concerns, incidents and breaches

Serious or repeated failures may affect continued RMTI membership, registration or professional standing and may be considered under the RMTI Complaints & Concerns Procedure and, where appropriate, the Professional Conduct & Disciplinary Procedure. Any resulting sanctions, suspension or removal from the professional register must be determined through the applicable procedures, with appropriate regard to fairness, proportionality and due process.

RESPONSIBILITY FOR COMPLIANCE

RMTI registered therapists are responsible for understanding and applying these standards within their own practice setting. Employers or clinic procedures may add requirements, but they do not remove the therapist's responsibility to meet RMTI standards and applicable law.

3. RMTI CODE OF PROFESSIONAL CONDUCT & ETHICS

This Code sets out the professional and ethical standards represented by membership and registration with Regulated Massage Therapists of Ireland (RMTI), an independent professional association for qualified massage therapists in Ireland. It is intended to operate alongside RMTI registration, complaints, disciplinary, CPD, insurance, safeguarding and other supporting policies.

3.1. PURPOSE OF THIS CODE

Membership and registration with RMTI represent professional standing, professional responsibility and a commitment to the standards of the profession. RMTI supports and represents qualified massage therapists, while members commit to responsible, ethical and professional practice.

Registered therapists are expected to place the welfare and dignity of clients at the centre of their practice, work within the limits of their competence and qualifications, and conduct themselves in a way that supports public confidence in massage therapy.

Compliance with this Code is a condition of RMTI membership and continued registration. RMTI will apply the Code fairly and proportionately, with the primary aims of supporting good professional practice, strengthening the standing of the profession, protecting the public and maintaining confidence in massage therapy. A serious or repeated failure to meet these standards may result in action under RMTI complaints and professional conduct procedures, including conditions on registration, suspension or removal from the RMTI Register.

3.2. Put the client first

An RMTI registered therapist must:

1. Act in the best interests of the client;
2. Make client safety, welfare, dignity and comfort a priority;
3. Provide treatment only where there is a reasonable basis for believing it is appropriate for the client;
4. Recognise relevant cautions and contraindications;
5. Modify, postpone or decline treatment where appropriate;
6. Never knowingly place a client at unnecessary risk; and
7. Refer a client to an appropriate healthcare professional where the client's needs fall outside the therapist's competence or scope of practice.

3.3. Practise within your competence

Registered therapists must work within the limits of their education, training, competence and professional scope of practice. A therapist must:

1. Provide only treatments and techniques for which they have appropriate training and competence;
2. Understand the limitations of massage therapy;
3. Recognise when another healthcare or suitably qualified professional should be consulted;
4. Not diagnose medical conditions unless separately qualified and legally entitled to do so;
5. Not make claims for massage therapy that cannot reasonably be supported; and
6. Maintain and develop professional knowledge and skills throughout registration.

3.4. Represent your qualifications honestly

Registered therapists must accurately represent their qualifications, training, professional experience, RMTI registration status, professional memberships and services offered.

A therapist must not claim or imply qualifications, professional status, specialist expertise or recognition that they do not hold.

RMTI registration, the RMTI name, registration number and any RMTI mark or logo must only be used in accordance with RMTI requirements.

3.5. Obtain informed consent and safeguard children

Clients have the right to make informed decisions about their treatment. Before treatment, therapists must explain the nature and purpose of the proposed treatment sufficiently for the client to make an informed decision. Consent must be given freely and may be withdrawn at any time.

Therapists must respect a client's right to ask questions, decline any part of treatment, request that treatment is modified, withdraw consent or end a treatment session.

Where services are provided to children, therapists must comply with applicable child safeguarding requirements, including the Children First Act 2015 and relevant Children First guidance. Appropriate consent and safeguarding procedures must be in place for treatment involving a person under 18.

RMTI will set out further safeguarding requirements in its Child Safeguarding Standard.

3.6. Maintain professional boundaries

The relationship between therapist and client is a professional relationship and must be treated as such.

Registered therapists must maintain clear and appropriate physical, emotional and personal boundaries. Sexualised behaviour, comments or contact within the therapeutic relationship are unacceptable.

A therapist must never exploit the professional relationship for sexual, emotional, financial or other personal advantage. Treatment, positioning, clothing and draping must respect the client's privacy, dignity and comfort.

3.7. Respect privacy, confidentiality and data protection

Information provided by a client in the course of professional practice must be treated as confidential.

Registered therapists must process and protect client information in accordance with applicable data protection law, including the GDPR and Data Protection Act 2018. Health information and other special category personal data must only be collected, used, retained or disclosed where there is an appropriate lawful basis and the additional requirements applying to such data have been met.

Client records must be kept securely, access restricted appropriately, and information disclosed only where there is a lawful and appropriate basis. The obligation to respect confidentiality continues after the professional relationship has ended.

3.8. Treat people fairly and with respect

Registered therapists must treat clients, colleagues and other professionals with dignity, courtesy and respect.

Registered therapists must provide services fairly and must not unlawfully discriminate in the provision of their professional services.

Professional decisions should be based on legitimate considerations such as client needs, treatment appropriateness, the therapist's competence and the safety of those involved.

3.9. Maintain a safe and professional practice

Registered therapists are responsible for maintaining an environment appropriate to professional massage therapy. This includes appropriate standards of hygiene and infection prevention, cleanliness, equipment safety, client privacy, record keeping, professional presentation, and health and safety.

A therapist must not provide treatment while impaired by alcohol, recreational drugs, medication, illness or any other condition that could materially affect the ability to practise safely.

3.10. Maintain appropriate professional insurance

Registered therapists must maintain professional insurance appropriate to the treatments and services they provide and in accordance with RMTI registration requirements.

Evidence of current insurance must be provided to RMTI when required. A therapist must inform RMTI if required insurance cover expires, is withdrawn or materially changes in a way that may affect eligibility for registration.

3.11. Maintain professional competence

RMTI membership and registration carry an ongoing responsibility to maintain professional knowledge and competence, supported by continuing professional development throughout a therapist's career.

Registered therapists must meet RMTI Continuing Professional Development requirements and maintain appropriate evidence of CPD activity. Therapists should reflect on the limits of their own knowledge and skills and undertake additional education or seek professional advice where necessary.

3.12. Communicate and advertise honestly

Information provided to clients or the public must be accurate, responsible and not misleading. Registered therapists must not exaggerate the benefits or likely outcomes of treatment, guarantee treatment results, make misleading healthcare claims, misrepresent qualifications or experience, suggest professional or insurer recognition that does not exist, or use testimonials or promotional material in a misleading manner.

Fees and relevant terms of service should be communicated clearly to clients.

3.13. Maintain appropriate client records

Registered therapists must maintain appropriate and accurate records of their professional work. Records should contain sufficient information to support continuity, accountability and safe professional practice.

Records must be stored securely and retained in accordance with applicable legal and professional requirements. They must be accurate and must not be improperly altered, falsified or destroyed.

3.14. Work appropriately with other professionals

Registered therapists should recognise the limits of their own professional role and work respectfully with other healthcare and professional practitioners.

Where appropriate, and with the client's consent or another lawful basis where applicable, therapists should support referral or communication with another suitably qualified professional. Therapists must not discourage a client from seeking appropriate medical advice or treatment.

3.15. Act with professional integrity

Registered therapists must behave honestly and responsibly in their professional activities. They must not engage in fraud or deliberate deception; falsify qualifications, insurance, CPD or client records; improperly use another person's professional credentials or registration number; knowingly assist another person to misrepresent professional status; or engage in behaviour that presents a serious risk to clients or undermines confidence in RMTI membership or registration.

3.16. Raise and respond to concerns

Registered therapists have a responsibility to take reasonable action where they become aware of circumstances that may place clients or the public at serious risk.

Where appropriate, concerns should be raised through RMTI complaints and professional conduct procedures or with another relevant authority. Registered therapists must cooperate honestly and reasonably with an RMTI investigation concerning their registration or professional conduct.

Therapists must not intimidate, disadvantage or retaliate against a person because that person has raised a concern in good faith.

3.17. Inform RMTI of matters affecting registration

A registered therapist must inform RMTI promptly of any material matter that may affect eligibility or suitability for continued registration. This may include loss or restriction of professional insurance; a relevant criminal conviction; disciplinary action by another professional organisation or register; restrictions imposed on professional practice; findings of serious professional misconduct; or other circumstances specified within RMTI registration requirements.

The existence of such a matter does not automatically determine an outcome. RMTI will consider relevant information in accordance with its published procedures.

3.18. Responsibility for continued registration

Each registered therapist is personally responsible for maintaining the requirements associated with RMTI membership and registration, including professional competence, appropriate insurance, required CPD, accurate registration information and compliance with this Code.

RMTI membership and registration should provide therapists with meaningful professional standing and give clients, insurers and other stakeholders confidence that members have agreed to meet defined professional standards and remain accountable to them.

Declaration

As an RMTI registered therapist, I agree to practise in accordance with the RMTI Code of Professional Conduct & Ethics and the standards, policies and requirements associated with my registration.

I understand that continued registration is dependent upon maintaining these requirements and that concerns regarding my professional conduct may be considered under RMTI published procedures.

IRISH LEGAL AND REGULATORY REFERENCES FOR REVIEW

The following sources were used to check the areas of this working draft most directly affected by Irish law. These references are included for RMTI review and do not constitute legal advice.

1. **Children First Act 2015:** Irish Statute Book - relevant services and mandated persons provisions.
2. Children First: National Guidance for the Protection and Welfare of Children: Tusla - safeguarding and reporting guidance.
3. **General Data Protection Regulation (GDPR) and Data Protection Act 2018:** Data Protection Commission guidance - health data, lawful processing, security and retention.
4. **Equal Status Acts 2000-2018:** Irish Statute Book - non-discrimination in the provision of services.
5. **Health and Social Care Professionals Act 2005 / CORU:** Irish statutory health and social care regulation benchmark. Massage therapists are not currently among the professions subject to CORU statutory registration.

Before formal adoption, RMTI should obtain Irish legal review of the complete policy suite, particularly safeguarding, data protection, complaints and disciplinary procedures.

4. COMPLAINTS & CONCERNS PROCEDURE

4.1. PURPOSE

RMTI is an independent professional association for qualified massage therapists in Ireland, committed to supporting high professional standards, protecting the public and maintaining confidence in RMTI membership and registration. This procedure provides a fair and transparent way for concerns about the professional conduct or practice of an RMTI member or registered therapist to be raised, assessed and, where necessary, referred into RMTI's formal professional conduct process.

The purpose is not to turn every disagreement, service issue or mistake into a disciplinary matter. RMTI's role is to consider concerns that may indicate a breach of RMTI standards, create a public-protection issue or call a therapist's professional standing or continued registration into question, while ensuring that both the person raising the concern and the therapist concerned are treated fairly.

4.2. Who may raise a concern

A concern may be raised by a client, member of the public, another therapist or healthcare professional, an employer, insurer, organisation, RMTI itself, or another person with relevant information.

RMTI may also consider information received from another professional or regulatory body where it is relevant to registration or public protection.

4.3. Concerns RMTI may consider

1. A possible breach of the RMTI Code of Professional Conduct & Ethics or another RMTI standard.
2. Practice outside verified qualifications, competence or professional scope.
3. Serious or repeated failures involving consent, confidentiality, client care or professional boundaries.
4. Practising without required professional insurance or materially misrepresenting professional status.
5. Dishonesty, misleading advertising, falsified documentation or material non-disclosure.
6. Conduct that may place clients or the public at risk.
7. A serious matter affecting continued suitability for RMTI registration.

4.4. Matters outside RMTI’s role

RMTI is an independent professional association operating a voluntary professional self-regulatory and registration framework. It is not a statutory regulator, court, compensation scheme, employer or law-enforcement body.

Where another body is better placed to deal with a matter, RMTI may explain that position or refer the person to an appropriate route. This does not prevent RMTI considering any separate issue that is relevant to the therapist's RMTI registration.

4.5. Raising a complaint or concern

RMTI should provide a clear route for submitting a concern in writing. The person raising it should normally provide the therapist's name and, where known, registration number; a clear description of what happened; relevant dates and locations; and any supporting information or documents.

RMTI may seek clarification before deciding whether a matter falls within this procedure. Anonymous information may be considered where it raises a credible public-protection concern, but anonymity may limit what RMTI can fairly investigate or act upon.

4.6. Acknowledgement and initial assessment

RMTI will acknowledge receipt and carry out an initial assessment. The purpose is to establish whether the matter concerns an RMTI member or registered therapist, falls within RMTI's role, has sufficient information to assess, and appears capable of engaging an RMTI professional standard.

A concern may be closed at this stage where it is outside RMTI's remit, clearly without substance, trivial in the context of professional membership or registration, abusive, vexatious or made in bad faith. A decision to close a matter should be recorded with reasons.

4.7. Local resolution

Some service, communication or lower-level concerns may be more appropriately raised first with the therapist or practice. RMTI may suggest local resolution, explanation, corrective action or other proportionate steps where this is safe and appropriate.

Local resolution should not be required where the allegation is serious, involves safeguarding, sexual or professional boundary concerns, dishonesty, significant public risk, or where direct contact would be inappropriate.

4.8. Immediate risk and safeguarding

Where information suggests an immediate risk to a child, vulnerable person or the public, RMTI will prioritise public protection and consider whether the matter should be referred to the appropriate statutory authority or emergency service.

RMTI's own process must not delay a report or referral that is required by law or necessary to address an immediate risk.

4.9. Fair notice to the therapist

Where a complaint proceeds beyond initial assessment, the registered therapist should normally be informed of the substance of the concern and given a reasonable opportunity to respond and provide relevant information.

RMTI will apply fair procedures and will not treat an allegation as established merely because a complaint has been made. Information may be withheld or handled differently only where there is a lawful and proportionate reason, for example to protect a person or avoid prejudicing another investigation.

4.10. Gathering information

RMTI may request relevant information from the complainant, therapist or another appropriate source. Information gathered should be proportionate to the issue under consideration.

RMTI may pause or coordinate its process where Gardaí, Tusla, a court, employer, insurer or another competent body is dealing with the same underlying matter and proceeding immediately could prejudice that process.

4.11. Preliminary outcomes

1. No further RMTI action.
2. Request for further information or clarification.
3. Advice that the matter is more appropriately dealt with through another route.
4. Informal or proportionate resolution where appropriate and accepted.
5. Referral to the RMTI Professional Conduct & Disciplinary Procedure where the concern is sufficiently serious or raises a material question about professional standards, client safety, professional standing or continued registration.

4.12. Relationship with disciplinary procedure

This procedure is the route for receiving and assessing complaints and concerns. It is not itself the final disciplinary process.

Where a matter warrants formal investigation or potential action against registration, it should move into the RMTI Professional Conduct & Disciplinary Procedure, which will set out investigation, decision-making, possible sanctions and review or appeal arrangements.

4.13. Confidentiality and data protection

Complaints frequently contain sensitive personal information. RMTI will restrict access to those who require the information for legitimate complaints, registration, governance or professional-conduct purposes and will process information in accordance with applicable data-protection law.

RMTI cannot promise absolute confidentiality. Information may need to be shared with the therapist complained about, relevant decision-makers, professional advisers or an appropriate authority where required for fair process, public protection or law.

4.14. Communication and records

RMTI should maintain a clear case record showing the concern received, key correspondence and evidence, assessment, decisions, reasons, referrals and outcome. The complainant and therapist should be kept appropriately informed of material stages, subject to confidentiality and legal limitations.

4.15. Unreasonable or abusive use of the process

RMTI may limit or discontinue engagement where communications are abusive, threatening, persistently repetitive or otherwise constitute an unreasonable use of the complaints process. This should not be used to avoid consideration of a genuine public-protection concern.

4.16. Review

A person affected by an initial decision to close a complaint should be told whether a review is available and, if so, how to request it. Any review should focus on whether the procedure was properly applied and whether relevant information was considered.

Formal review or appeal rights following disciplinary action will be set out in the Professional Conduct & Disciplinary Procedure.

OPERATIONAL PRINCIPLE

RMTI's complaints process should be accessible enough to protect the public and support confidence in the profession, but structured enough to distinguish genuine professional concerns from ordinary service dissatisfaction, misunderstandings or inappropriate complaints. Every material decision should be proportionate, capable of being explained and supported by a clear record.

5. RMTI CONTINUING PROFESSIONAL DEVELOPMENT (CPD) POLICY

5.1. PURPOSE

Continuing Professional Development (CPD) is an important part of professional membership and career-long learning. It is also an ongoing requirement of RMTI registration and good standing. CPD helps therapists maintain and develop the knowledge, skills and professional judgement required to practise safely, effectively and responsibly throughout their professional careers.

RMTI is an independent professional association committed to supporting qualified massage therapists in Ireland. This policy establishes the minimum CPD requirements for registered members, identifies acceptable forms of professional development and explains how compliance is recorded and verified.

RMTI aims to ensure that CPD is meaningful, accessible and relevant to professional practice, rather than simply an administrative requirement.

5.2. Application of the Policy

This policy applies to all therapists holding active RMTI registration. Members are required to undertake continuing professional development throughout their registration, subject to any transitional arrangements or exceptional circumstances accepted by RMTI.

5.3. Annual CPD requirement

All registered RMTI members must complete a minimum of 15 hours of Continuing Professional Development annually.

CPD should be relevant to the therapist's professional practice, registered disciplines and ongoing development needs. The annual requirement may be satisfied through a combination of:

1. Discipline-specific professional education and practical skills development.
2. Advanced or specialist training.
3. Broader professional learning, including ethics, safeguarding, communication, record keeping, research literacy and professional responsibilities.
4. Other relevant educational activities that contribute meaningfully to professional competence.

Therapists registered in more than one discipline should ensure that their CPD supports their continuing competence across those disciplines. Learning that is relevant to multiple disciplines may contribute to the annual requirement without the need to duplicate hours.

The annual requirement remains **15 hours per member**, irrespective of the number of registered disciplines.

5.4. Recognised CPD Activities

RMTI recognises that professional development takes many forms and is not limited to attendance at formal training courses. Acceptable CPD activities may include:

1. Formal courses, workshops, seminars and conferences.
2. Structured online learning, webinars and educational programmes.
3. Relevant professional reading and research.
4. Case reviews, peer discussions, professional supervision and mentoring.
5. Practical skills development and structured professional training.

6. Study of professional standards, ethics, safeguarding and legal responsibilities.
7. Research activities and structured review of current evidence.
8. Other learning activities that can reasonably be demonstrated to contribute to professional knowledge, skills or practice.

CPD activities should be credible, relevant and appropriate to the therapist's professional responsibilities.

RMTI encourages members to undertake a reasonable variety of learning activities that reflect their professional interests, development needs and areas of practice. Routine professional work, ordinary client treatment hours or purely commercial activities do not automatically qualify as CPD unless they include a genuine and identifiable learning component.

5.5. CPD Records and Reflective Practice

Registered therapists must maintain an accurate and up-to-date record of their continuing professional development. RMTI may provide a standard CPD log or online recording facility to assist members in maintaining these records.

A CPD record should include:

1. Date and title of the activity.
2. Type of activity and provider or source, where applicable.
3. Number of CPD hours completed.
4. Relevant professional discipline or area of learning.
5. Brief description of the learning undertaken.
6. Supporting evidence, where reasonably available.

Reflective Practice

RMTI encourages members to include a brief reflection on what they learned and how that learning may influence their professional practice. This need not be extensive. A short summary demonstrating the relevance and value of the activity will generally be sufficient. The purpose of reflective practice is to encourage meaningful professional development rather than simply the accumulation of CPD hours.

Supporting Evidence

Supporting evidence may include:

1. Certificates of attendance or completion.
2. Course or workshop records.
3. Educational programmes or learning materials.
4. Professional reading or research records.
5. Notes from structured learning activities.
6. Reflective learning records.
7. Other reasonable evidence demonstrating participation and learning.

RMTI recognises that not all legitimate CPD activities result in a formal certificate. The absence of a certificate does not automatically prevent an activity from being accepted, provided the therapist can supply a credible record of the learning undertaken.

5.6. Annual CPD Declaration

As part of the annual membership renewal process, registered therapists must confirm that they have completed the required 15 hours of CPD during the applicable registration year. Members must also confirm that they have maintained an appropriate CPD record and can provide supporting information if requested.

The annual declaration forms part of the therapist's continuing registration responsibilities and must be accurate and truthful.

5.7. CPD Verification and Audit

RMTI may periodically review or audit members' CPD records to ensure that professional development requirements are being maintained. Audits may be conducted through random selection or where there is a reasonable need to review an individual member's CPD compliance. Members selected for audit must provide their CPD records and reasonable supporting evidence within the timeframe specified by RMTI.

The purpose of CPD verification is to maintain the credibility of professional registration and encourage consistent professional development. RMTI will apply its audit procedures fairly and proportionately.

5.8. Failure to Meet CPD Requirements

Where a member has not completed the required annual CPD, RMTI will consider the circumstances before determining an appropriate response. Failure to meet the CPD requirement will not automatically be treated as professional misconduct. Depending on the circumstances, RMTI may:

1. Request clarification or additional evidence.
2. Require outstanding CPD to be completed within an agreed period.
3. Agree an appropriate professional development plan.
4. Defer membership renewal pending completion of the requirement.
5. Place registration under review.
6. Allow registration to lapse until the applicable requirements have been satisfied.

RMTI's approach will prioritise supporting members in returning to compliance while maintaining the integrity of professional registration.

5.9. Exceptional Circumstances

RMTI recognises that exceptional personal or professional circumstances may affect a member's ability to complete the annual CPD requirement. These may include:

1. Extended illness or injury.
2. Parental or caring responsibilities.
3. Prolonged absence from professional practice.
4. Other significant circumstances that materially affect participation in professional development.

Members experiencing such circumstances should contact RMTI to discuss their situation. RMTI may request reasonable supporting information and may agree an appropriate adjustment, extension or return-to-practice development plan. Decisions will be considered individually, fairly and proportionately.

5.10. New Members and Partial Registration Years

Where a therapist joins RMTI part-way through a registration year, the annual CPD requirement may be calculated proportionately. The applicable requirement will be communicated to the member when registration is confirmed.

CPD completed before initial RMTI registration will not automatically count towards a subsequent registration period unless expressly accepted by RMTI.

5.11. CPD, Professional Qualifications and Scope of Practice

Continuing Professional Development supports therapists in maintaining and expanding their professional knowledge, skills and competence. CPD activities may include formal qualifications, specialist training, workshops, seminars, online learning and other relevant educational activities.

However, completion of CPD does not automatically confer a new professional qualification or authorise practice beyond the therapist's competence. Where a member completes an additional professional qualification, they may submit it for verification and inclusion in their RMTI professional profile in accordance with the **RMTI Registration & Qualification Standards**.

Additional qualifications will be assessed in accordance with the applicable **RMTI Qualification Verification Policy**. Members remain responsible for practising within the scope of their professional education, qualifications and competence.

5.12. RMTI's Commitment to Professional Development

RMTI is committed to supporting members throughout their professional careers by encouraging continuing education, professional development and lifelong learning. In addition to establishing clear and proportionate CPD requirements, RMTI aims to provide members with access to relevant educational resources, learning opportunities and professional guidance.

Members remain free to choose appropriate CPD from a range of credible providers, provided the activities meet RMTI's published requirements. RMTI will periodically review its CPD standards to ensure they remain relevant, practical and supportive of the evolving massage therapy profession.

CPD PRINCIPLE

RMTI registration represents an ongoing commitment to professional competence, lifelong learning and responsible practice.

Continuing Professional Development should support therapists in maintaining current knowledge, developing their professional skills and providing safe, effective and professionally responsible care.

Through meaningful CPD requirements and accessible professional development opportunities, RMTI aims to support its members throughout their careers while strengthening public confidence in the massage therapy profession.

6. CONTINUING REGISTRATION & RENEWAL POLICY

6.1. PURPOSE

RMTI is an independent professional association representing qualified massage therapists in Ireland. Membership and professional registration represent ongoing commitments to maintaining appropriate professional standards.

This policy establishes the requirements and procedures for maintaining, renewing and, where appropriate, restoring RMTI registration. Its purpose is to ensure that therapists listed as actively registered continue to meet RMTI's professional requirements while providing a renewal process that is clear, fair, proportionate and straightforward for members.

6.2. Registration period

RMTI registration operates on a rolling 12-month basis. A therapist's registration year begins when their registration is approved and activated and normally continues for 12 months from that date.

RMTI does not operate a single calendar-year renewal date for all registrants. Each therapist therefore has an individual registration start date and renewal due date.

3. Requirements for continued registration

To maintain active RMTI registration, members must continue to meet the applicable professional requirements throughout their registration period and at renewal. These include:

1. Maintaining appropriate and current professional indemnity and public liability insurance.
2. Meeting RMTI's Continuing Professional Development requirements.
3. Complying with the RMTI Code of Professional Conduct & Ethics and other applicable professional standards.
4. Keeping personal, contact and professional registration information accurate and up to date.
5. Making any required professional declarations concerning matters that may affect registration or public protection.
6. Paying the applicable annual renewal fee.

Members are responsible for maintaining these requirements throughout their registration.

Payment of the annual renewal fee alone does not establish continued eligibility for registration.

6.4. Renewal process

RMTI will invite members to renew their registration before their individual expiry date.Renewal will normally be completed through the RMTI member account or another process specified by RMTI.

Members will be required to confirm or update their registration details, complete the applicable professional declarations, confirm compliance with continuing registration requirements and pay the renewal fee. RMTI may request supporting evidence where necessary.

Registration will be renewed once all applicable requirements have been satisfied and the renewal process has been completed.

6.5. Renewal reminders

RMTI should issue reasonable reminders before the individual renewal date. The therapist remains responsible for maintaining their registration even where a reminder is not received because contact details are incorrect or for another reason.

6.6. Evidence and audit

RMTI may operate a proportionate evidence and audit system rather than requiring every supporting document to be resubmitted at every renewal.

Therapists must retain appropriate evidence and provide it when requested. RMTI may require evidence of CPD, insurance or other continuing-registration requirements either at renewal or as part of an audit.

6.7. Changes during the registration year

Members must notify RMTI of material changes that may affect their professional registration. These may include:

1. A material change to professional insurance.
2. A change of name or other important registration information.
3. Matters affecting a previous professional declaration.
4. Restrictions on professional practice.
5. Disciplinary findings or other matters relevant to professional standing.
6. Other circumstances that may affect compliance with RMTI's registration requirements.

Members should not wait until annual renewal to report matters requiring notification. Where another RMTI policy specifies a reporting timeframe, that requirement must be followed.

6.8. Outstanding complaints or conduct matters

A pending complaint or professional conduct matter does not automatically prevent renewal. RMTI may renew, defer a decision, impose an appropriate registration status or take another step permitted under its procedures depending on the circumstances and any public-protection considerations.

Renewal must not be used to bypass or extinguish an existing complaint, investigation, condition or disciplinary process.

6.9. Incomplete renewal

Where a renewal application is incomplete or applicable requirements have not been satisfied, RMTI may request additional information or evidence. Where appropriate, RMTI may defer a renewal decision pending clarification, verification or resolution of an outstanding matter. RMTI may refuse renewal where:

1. Continuing registration requirements have not been met.
2. Material information remains unresolved.
3. Required declarations or supporting evidence have not been provided.
4. Another RMTI policy or procedure provides grounds for refusal.

Members will be informed of the reasons for a refusal or deferral and any applicable review or appeal process. Decisions will be made fairly, consistently and proportionately.

An incomplete or deferred renewal does not automatically extend active registration beyond its expiry date.

6.10. Registration Expiry and Lapse

If renewal has not been completed by the registration expiry date, the member's active registration will automatically lapse. The member's status on the public RMTI Register will be updated accordingly.

A therapist whose registration has lapsed must not represent themselves as currently registered with RMTI or use RMTI registration credentials in a manner suggesting active registration.Registration remains inactive until all applicable requirements have been satisfied and RMTI has formally restored active status.

6.11. Late renewal and restoration

RMTI will provide a **30-day restoration period following registration expiry**. During this period, a former member may apply to restore their registration through the normal renewal process without submitting a completely new membership application, provided all applicable requirements are satisfied.

Registration remains inactive throughout any period of lapse and is restored only when the renewal requirements have been completed and RMTI has confirmed reactivation. Where registration has been expired for more than 30 days, RMTI may require additional verification, a fuller reassessment or a new application.

Where a significant period has elapsed, RMTI may request evidence of current professional insurance, recent professional development and any other information reasonably necessary to establish continued professional competence. Any applicable restoration fees or administrative charges will be published by RMTI. Restoration does not retrospectively confer active registration for the period during which registration had lapsed.

6.12. Breaks from professional practice

Members who take an extended break from professional practice may choose not to renew their active RMTI registration. Before returning to active registration, they may be required to demonstrate appropriate current insurance, relevant professional development and any additional requirements necessary to support a safe return to practice.

The applicable restoration requirements will depend on the length of the break and the member's individual circumstances. Where registration has expired, the restoration procedures outlined in Section 11 will apply.

6.13. Renewal following a significant break

RMTI will maintain an accurate record of each member's registration history, including:

1. Original registration date.
2. Current registration period and expiry date.
3. Renewal decisions and dates.
4. Periods of lapse or suspension, where applicable.
5. Restoration of registration.
6. Current registration status.

RMTI is responsible for applying renewal requirements consistently, maintaining accurate registration information and ensuring that the public register reflects each therapist's current professional registration status. The renewal process will be administered in a manner that supports professional accountability while remaining proportionate and straightforward for members.

CONTINUING REGISTRATION PRINCIPLE

Continued RMTI registration represents more than payment of an annual membership fee. It demonstrates an ongoing commitment to maintaining appropriate professional insurance, continuing professional development, ethical practice and the professional responsibilities associated with RMTI membership.

Through clear and consistent renewal requirements, RMTI aims to support its members in maintaining professional standards while strengthening public confidence in the massage therapy profession.

7. GOVERNANCE & INDEPENDENCE FRAMEWORK

7.1. PURPOSE

This framework sets out the principles by which RMTI will govern the organisation as an independent professional association and, within it, operate its membership, registration, professional standards and public-protection functions. Its purpose is to support the profession, protect the public, ensure consistent decision-making and maintain confidence in the independence and integrity of RMTI processes.

RMTI is an independent professional association and voluntary professional self-regulatory body. It is not a statutory regulator, and this framework does not confer statutory powers.

7.2. Governance principles

RMTI will conduct its activities with integrity, fairness, consistency, accountability and appropriate transparency. Its governance should support both sides of RMTI's purpose: representing and supporting qualified massage therapists, and maintaining meaningful professional standards that protect the public and strengthen confidence in the profession.

Public protection and the integrity of professional standards and the Register must not be compromised by commercial, educational or personal interests. At the same time, RMTI governance should ensure that member representation, professional development and support are pursued transparently and in a way that is consistent with those standards.

7.3. Independence of the Register

RMTI registration decisions must be based on published qualification and professional requirements, satisfactory verification and compliance with applicable policies. Applicants must receive neither preferential nor adverse treatment because of where they trained or whether they have a commercial, educational or professional relationship with RMTI or individuals associated with it.

RMTI may maintain professional and commercial relationships with education and training providers, insurers, professional bodies and other organisations. However, these relationships must not influence individual registration decisions or compromise the independence of the Register. The same qualification standards and verification requirements must be applied consistently to applicants from every eligible education and training provider.

Where a person involved in registration decisions has a relevant connection with an applicant, training provider or other interested party, that connection must be declared and managed in accordance with RMTI's conflict-of-interest requirements.

7.4. Independence from education and training providers

RMTI's directors retain overall responsibility for the organisation's governance and the integrity of its professional registration functions. RMTI will establish and document who is authorised to make or approve decisions relating to:

1. Membership and professional registration.
2. Registration renewal and restoration.
3. Complaints and professional conduct.
4. Suspension or removal from the Register.
5. Reviews and appeals.

Routine administrative checks and processing may be delegated to appropriately authorised staff or approved administrative systems. Material professional decisions must remain subject to appropriate human oversight and clearly defined decision-making authority.

Where practicable, RMTI will maintain separation between the functions of receiving information, investigating concerns, making formal decisions and reviewing or appealing those decisions. These arrangements should be proportionate to RMTI's size, resources and operational requirements while maintaining fairness, accountability and professional independence.

7.5. Conflicts of Interest

Anyone involved in an RMTI decision must identify any actual, potential or perceived conflict of interest relevant to that decision.

A conflicted person should not participate in deliberation or decision-making where the conflict could reasonably call the fairness or independence of the decision into question. The declaration and action taken should be recorded.

7.6. Registration Decisions

Applications must be assessed consistently against RMTI's Registration & Qualification Standards and other applicable policies. Registration decisions must be made by appropriately authorised individuals or through approved administrative procedures. Applicants must satisfy all applicable requirements, including payment of the registration fee, before active registration is confirmed.

Approval of an application does not, by itself, establish active registration.

7.7. Complaints and Professional Conduct Decisions

Complaints and concerns should be handled under the RMTI Complaints & Concerns Procedure. Matters requiring formal findings or sanctions should be handled under the Professional Conduct & Disciplinary Procedure.

Decisions should be proportionate, documented and made without improper influence from commercial relationships, personal interests or reputational considerations.

7.8. Review and Appeal

RMTI should provide an appropriate route to request review or appeal where its policies provide for one. **No individual may determine an appeal or review of their own substantive decision.**

Reviews and appeals must be considered by an appropriately authorised person who is sufficiently independent of the original decision. The outcome and reasons for the decision must be documented in accordance with RMTI's record-keeping requirements.

7.9. Records and Accountability

RMTI will maintain appropriate records of material governance and registration decisions, including the decision-maker, evidence considered, conflicts declared, outcome, reasons and any review or appeal.

Access to sensitive registration, complaints and conduct information should be limited to people with a legitimate RMTI role.

7.10. Transparency

RMTI should publish clear information about its purpose, registration standards, professional standards, complaints arrangements and the meaning of registration status. Governance information should be sufficient to allow registrants, the public, insurers and other stakeholders to understand how RMTI is accountable without publishing confidential personal or case information.

7.11. Relationships with Insurers and External Stakeholders

RMTI may engage with insurers, healthcare organisations, professional bodies and other stakeholders to represent the profession, strengthen recognition, improve standards and build public confidence. Such

relationships must not give an external organisation improper influence over individual membership, registration or conduct decisions.

Where stakeholder feedback identifies legitimate risks or opportunities to improve standards, RMTI may consider that evidence through its normal governance process.

7.12. Governance Review and Continuous Improvement

RMTI will periodically review its governance arrangements, professional standards, policies, member-support arrangements and operating procedures.

These reviews should ensure that RMTI's activities remain proportionate, workable and aligned with its purpose of supporting therapists, representing the profession, maintaining professional standards and protecting the public.

The Governance & Independence Framework should also be reviewed whenever there is a material change to RMTI's ownership, governance structure, registration model or professional relationships that could affect the independence or integrity of its registration functions.

GOVERNANCE PRINCIPLE

RMTI registration decisions must be based on published standards, verified evidence and clearly defined professional requirements.

Decisions must be made by appropriately authorised individuals, with conflicts of interest identified and managed. No training provider, commercial partner, individual or other external interest may improperly influence who is admitted to or remains on the RMTI Register.

8. PROFESSIONAL CONDUCT & DISCIPLINARY PROCEDURE

8.1. PURPOSE

This procedure explains how RMTI will deal with matters that raise a potentially serious question about the professional conduct of an RMTI member or registered therapist. Its purpose is to uphold meaningful professional standards, protect the public, maintain confidence in RMTI membership and registration, support the integrity of the profession and provide a fair and proportionate process for the therapist concerned.

RMTI is an independent professional association for qualified massage therapists in Ireland, operating a voluntary professional self-regulatory and registration framework. It is not a statutory regulator and this procedure does not give RMTI statutory powers. RMTI's decisions relate to RMTI membership and registration and to a therapist's status on the RMTI Register.

8.2. When this procedure may apply

A matter may enter the formal conduct process following assessment under the Complaints & Concerns Procedure, through information received from another appropriate source, or where RMTI itself becomes aware of information that may materially affect membership, registration or professional standing.

1. A serious or repeated breach of the RMTI Code of Professional Conduct & Ethics;
2. Dishonesty, fraud or material misrepresentation connected with registration or professional practice;
3. Serious or repeated failures relating to client safety, consent, confidentiality or professional boundaries;
4. Practising materially outside verified competence or scope;
5. Failure to maintain required professional insurance or other continuing-registration requirements where the circumstances raise a conduct concern;
6. Failure to comply with a condition previously placed on RMTI registration;
7. A relevant criminal conviction, disciplinary finding, restriction or removal by another professional body where it may affect public protection or confidence in RMTI registration.

8.3. Threshold and Initial Conduct Assessment

Not every complaint, disagreement or professional mistake warrants formal disciplinary proceedings. RMTI will consider the seriousness of the concern, potential risk to the public, available evidence, whether the conduct is repeated, and any relevant mitigating circumstances.

Disputes concerning fees, customer service or isolated minor matters will not normally result in formal disciplinary action unless they raise a significant concern about professional standards, client safety or public protection.

Where formal consideration is warranted, RMTI will appoint an appropriately authorised person or panel to assess the matter and determine whether further investigation is necessary. The initial assessment should identify the concern, the relevant RMTI professional standards, the available evidence and whether the matter meets the threshold for formal disciplinary proceedings.

Anyone involved in assessing, investigating or determining a professional conduct matter must declare any relevant actual, potential or perceived conflict of interest. Conflicts must be managed in accordance with the RMTI Governance & Independence Framework.

8.4. Notification to the Therapist

The therapist should be informed in writing, in sufficient detail, of the substance of the concern and the professional standards that may be relevant.

They must be given a reasonable opportunity to respond and provide information or evidence before formal findings are made.

RMTI may withhold or limit information only where there is a lawful and proportionate reason to do so, such as protecting another person's rights or an active safeguarding or criminal investigation.

8.5. Investigation and Evidence

RMTI may gather information reasonably necessary to establish the facts. This may include documents supplied by the complainant or therapist, registration and verification records, correspondence, relevant client records where lawfully available, and information from appropriate third parties.

RMTI must consider relevant evidence fairly, distinguish established facts from allegations or opinions, and maintain an appropriate record of the material relied upon.

8.6. Interim Public-Protection Measures

Where credible information indicates an immediate and serious risk to the public, RMTI may impose temporary conditions or suspend active registration while a professional conduct matter is investigated.

Any interim measure must be proportionate to the identified risk, kept under review and must not be presented as a finding of professional misconduct. The therapist must be informed of the reasons for the measure and given an appropriate opportunity to respond or request a review.

Where immediate action is necessary to protect the public, RMTI may implement an interim measure before receiving the therapist's response, provided an opportunity to respond and seek review is offered promptly afterwards. Interim measures must remain within RMTI's authority over its own membership and professional registration.

8.7. Decision-Making

Where formal findings are required, the decision must be made by an appropriately authorised person or panel with sufficient independence from the original complaint handling and investigation. The decision-maker must consider:

1. The available evidence.
2. The therapist's response.
3. The relevant RMTI professional standards.
4. Whether the allegation has been established on the balance of probabilities.

Decisions must be based on the evidence and made fairly, consistently and without improper influence. The findings and reasons for the decision must be documented.

8.8. Possible Outcomes and Relevant Considerations

Where no breach is established, the matter should be closed without a disciplinary finding. Where a breach is established, RMTI will determine an outcome proportionate to the seriousness of the matter, the risks involved and the need to uphold professional standards. Possible outcomes include:

1. No further action.
2. Advice or a formal warning.
3. A requirement to complete specified education, reflection, supervision or other remedial action.
4. Conditions on RMTI membership or registration for a defined period.

5. Suspension of RMTI membership or registration for a defined period.
6. Removal from RMTI membership and/or the RMTI Register, as applicable.
7. A defined period before an application for restoration or re-registration will be considered.

When determining an appropriate outcome, RMTI may consider:

8. The seriousness and consequences of the conduct.
9. Actual or potential harm to clients or the public.
10. Whether the conduct was deliberate, repeated or part of a wider pattern.
11. Previous relevant concerns or disciplinary findings.
12. The therapist's cooperation, insight and willingness to address the matter.
13. Steps already taken to remedy the concern.
14. The likelihood of recurrence.
15. Any relevant aggravating or mitigating circumstances.

Disciplinary outcomes are intended primarily to protect the public, uphold professional standards and maintain confidence in RMTI registration, rather than simply punish therapists.

Where risks can be addressed safely and proportionately, education, reflection, supervision or other remedial measures should be considered alongside more restrictive outcomes.

8.9. Written Decision

The therapist must receive a written decision setting out:

1. The allegation or concern considered.
2. The material findings.
3. The outcome and reasons for the decision.
4. Any conditions, sanctions or applicable timescales.
5. The available review or appeal procedure.

Where appropriate, the complainant may be informed of the outcome to the extent that RMTI can lawfully and fairly disclose the information.

8.10. Review and Appeal

A therapist has the right to request a review or appeal of a formal disciplinary finding or sanction. An appeal must normally be submitted in writing within 21 calendar days of notification of the disciplinary decision.

RMTI may accept an appeal submitted after this period where exceptional circumstances reasonably justify the delay. Grounds for review or appeal may include:

1. A material procedural error.
2. Significant new evidence that could not reasonably have been provided earlier.
3. A decision or sanction that is not reasonably supported by the findings.

An appeal or review must be considered by an appropriately authorised person who was not responsible for the original substantive decision. The reviewer must consider the relevant grounds and evidence fairly and independently.

The review may result in the original decision being upheld, varied, overturned or referred for reconsideration, as appropriate. The therapist must be informed of the outcome and reasons in writing.

8.11. Registration Status and Publication

Conditions, suspension or removal must be reflected accurately in RMTI's internal registration records and, where applicable, on the public RMTI Register. The public register should accurately reflect a therapist's current registration status, including whether registration is active, suspended, subject to conditions or removed, as appropriate.

The publication of registration status must be distinguished from the disclosure of detailed disciplinary findings or allegations.

Detailed disciplinary information will not automatically be published. Any publication or disclosure must have a clear public-protection, transparency or other legitimate basis and comply with applicable legal and data-protection requirements. RMTI will establish appropriate publication and retention procedures governing disciplinary information and public registration records.

8.12. Referral to Other Authorities

RMTI's disciplinary process does not replace the role of An Garda Síochána, Tusla, the courts, employers, insurers, statutory regulators or other appropriate bodies. Where information indicates that a matter should be reported or referred elsewhere, RMTI will act in accordance with applicable law and its safeguarding and governance responsibilities.

RMTI may pause or sequence its own proceedings where necessary to avoid prejudicing another investigation. Where appropriate, RMTI may continue to consider immediate public-protection measures within its own membership and registration responsibilities.

8.13. Confidentiality, Records and Consistency

Professional conduct cases may involve sensitive personal and professional information.

Access to case information must be restricted to individuals who require it for legitimate RMTI functions.

Records must be handled in accordance with applicable data-protection law and the **RMTI Records & Data Protection Standard**.

RMTI will maintain an appropriate and auditable record of professional conduct matters, including:

1. The original concern or allegation.
2. Initial assessment and threshold decision.
3. Relevant evidence and correspondence.
4. Declared conflicts of interest.
5. Investigation and decision-making responsibilities.
6. Findings and reasons.
7. Disciplinary outcomes and any conditions imposed.
8. Reviews or appeals.
9. Any resulting changes to registration status.

RMTI will periodically review professional conduct decisions to promote consistency and identify opportunities to improve professional standards, guidance and education.

PROFESSIONAL CONDUCT PRINCIPLE

RMTI membership and registration carry an ongoing responsibility to maintain professional standards, ethical conduct and accountability.

Where serious concerns arise, RMTI will respond fairly, independently and proportionately, with public protection and professional integrity at the centre of its decisions.

RMTI's disciplinary procedures are intended to uphold meaningful professional standards while ensuring that members are treated fairly and have appropriate opportunities to respond, seek review and address identified concerns.

9. RMTI PROFESSIONAL INSURANCE REQUIREMENTS

9.1. PURPOSE

RMTI is an independent professional association for qualified massage therapists in Ireland. Maintaining appropriate professional insurance while practising is a condition of RMTI membership and active professional registration.

The purpose of this requirement is to protect therapists and their clients where a claim arises from professional treatment or practice, support responsible professional practice and maintain confidence in RMTI's professional standards. RMTI operates on the principle that members accept responsibility for meeting their professional obligations, including maintaining appropriate insurance while practising.

9.2. Insurance Requirements

All practising RMTI registered therapists must maintain appropriate and current:

1. **Professional Indemnity / Professional Liability Insurance**, covering their professional treatment and therapeutic activities.
2. **Public Liability Insurance**, either included within their professional insurance policy or provided separately.

Insurance must be appropriate to massage therapy and cover the treatments, techniques and modalities the therapist provides, including any additional professional services offered alongside their RMTI-recognised disciplines. Therapists are responsible for confirming that their insurance covers their professional activities. A qualification or RMTI registration does not, by itself, establish that a particular treatment is insured.

9.3. Evidence and Verification

As part of their application for RMTI membership and registration, therapists must confirm that they hold appropriate professional insurance for the work they undertake.

RMTI operates primarily on a system of professional declaration and good faith.

Members may be asked to provide evidence of insurance where reasonably necessary to verify compliance with RMTI requirements.

Where supporting documentation is requested, this may include:

1. The name of the insured therapist.
2. The insurer or insurance provider.
3. The policy number or identifying reference.
4. The type and period of cover.
5. The professional activities or treatments covered.
6. The applicable level or limit of cover.

RMTI may seek additional clarification where the information supplied does not adequately demonstrate that the insurance requirement is met.

Verification by RMTI does not constitute insurance advice or a guarantee that an insurer will accept a future claim.

9.4. Maintaining Insurance and Annual Renewal

Practising RMTI registered therapists are responsible for maintaining appropriate insurance throughout their professional practice. As part of the annual RMTI membership and registration renewal process, members will be

required to declare that they maintain appropriate insurance while practising and agree to continue meeting this requirement.

RMTI will generally rely on this professional declaration rather than requiring members to submit insurance documentation at every policy renewal. Supporting evidence may be requested where reasonably necessary.

Members should notify RMTI if their insurance expires, is cancelled, withdrawn or materially restricted and this affects their ability to practise professionally. A temporary interruption in insurance does not automatically constitute a breach of professional conduct where the member is not undertaking professional treatments requiring that cover.

9.5. Changes in Professional Practice

Registered therapists are responsible for reviewing their insurance arrangements whenever there is a material change in their professional activities. Examples include:

1. Introducing new treatments, techniques or modalities.
2. Becoming self-employed or changing employment arrangements.
3. Working from additional premises or providing mobile treatments.
4. Employing or supervising other therapists.
5. Making another material change that may affect insurance coverage.

Therapists should confirm appropriate cover with their insurer or insurance provider before undertaking professional activities that may fall outside their existing policy.

9.6. Insurance for Different Working Arrangements

Therapists must ensure that their insurance arrangements appropriately cover the circumstances in which they practise. This includes employed, self-employed, mobile and multi-location practice.

Where a therapist relies on insurance provided by an employer, they remain responsible for confirming that the policy appropriately covers their professional activities. RMTI may request evidence of employer-provided insurance where reasonably necessary.

9.7. Understanding Insurance Arrangements

Therapists are responsible for understanding the terms and limitations of their professional insurance. Insurance policies may operate on a claims-made or occurrence basis, and additional or run-off cover may be necessary when changing insurers or ceasing professional practice.

Members should seek clarification from their insurer or insurance provider where necessary to ensure that their arrangements remain appropriate to their professional circumstances.

9.8. Lapsed or Inadequate Insurance

RMTI members are expected to maintain appropriate professional insurance while actively practising massage therapy, in accordance with the terms of their membership and registration. Members who allow their insurance to lapse, choose not to renew it, or experience a material change in their insurance arrangements should notify RMTI where this affects their ability to practise professionally.

A temporary break in insurance may arise for legitimate reasons, including a career break, sabbatical or temporary cessation of professional practice. Such circumstances will not automatically result in suspension or disciplinary action.

Where a member is no longer appropriately insured for their professional activities, RMTI may review their registration status and, where necessary, request clarification or updated evidence of insurance. RMTI will

consider the individual circumstances and seek a proportionate resolution, consistent with its Continuing Registration & Renewal Policy.

Knowingly continuing to practise without the required professional insurance may be considered under RMTI's Professional Conduct & Disciplinary Procedure.

9.9. False or Misleading Insurance Information

Submitting falsified, altered or deliberately misleading insurance documentation or declarations is a serious matter. Where there are reasonable grounds for concern, RMTI may seek clarification, request supporting evidence or verify information with the relevant insurance provider.

Where material dishonesty is established, RMTI may consider the matter under its Professional Conduct & Disciplinary Procedure. Membership or registration may be refused or withdrawn where it was obtained through materially false or misleading information, subject to fair process.

9.10. RMTI and Insurance Providers

RMTI does not require members to purchase insurance from any particular insurer or intermediary. Members may arrange their own insurance, provided it meets RMTI's requirements and appropriately covers their professional practice.

RMTI may provide general information about insurance providers or insurance arrangements but does not offer individual insurance advice or endorse a particular insurance product. RMTI membership or registration does not:

1. Provide professional insurance cover.
2. Guarantee the terms, adequacy or suitability of an individual insurance policy.
3. Guarantee that an insurer will accept a particular claim.
4. Guarantee recognition, reimbursement or acceptance by any particular health insurer.

Responsibility for understanding and maintaining appropriate professional insurance remains with the individual therapist.

PROFESSIONAL INSURANCE PRINCIPLE

Practising RMTI registered therapists are responsible for maintaining appropriate professional insurance for the treatments and services they provide.

RMTI operates on a foundation of professional responsibility, good faith and proportionate oversight. Members agree to maintain appropriate insurance while practising and to inform RMTI of changes that materially affect their ability to meet this requirement.

Temporary breaks from professional practice should not automatically result in penalties or disciplinary action.

10. QUALIFICATION VERIFICATION POLICY

10.1. PURPOSE

RMTI independently verifies the core professional qualifications on which membership and professional registration are based. Verification provides reasonable assurance that qualifications are genuine, belong to the applicant, were awarded by the stated awarding organisation and meet RMTI's published registration requirements.

Qualification verification is a core requirement of RMTI registration and supports professional credibility, public confidence and consistent registration standards.

10.2. What RMTI verifies

For each core qualification submitted in support of registration, RMTI will seek to establish:

1. The name of the qualification holder.
2. The qualification title and professional discipline.
3. The qualification level.
4. The awarding organisation.
5. The date of award.
6. The authenticity of the qualification.

Where relevant, RMTI may also verify the training provider through which the qualification was completed.

Verification confirms the qualification information checked by RMTI. It does not constitute a separate assessment or guarantee of an individual's current professional competence.

10.3. Evidence and Identity Verification

Applicants must provide a clear copy of their qualification certificate or other acceptable formal evidence of the award.

RMTI may request additional supporting information where reasonably necessary, including:

1. A transcript or record of achievement.
2. Certificate, award, learner or candidate numbers.
3. Awarding-body verification information.
4. Training-provider information.
5. Course titles, completion dates or syllabus information.
6. Proof of identity.
7. Other relevant documentation required to complete verification.

RMTI must be reasonably satisfied that the qualification belongs to the person applying for registration.

Where an applicant's current name differs from the name appearing on their qualification documentation, RMTI may request appropriate supporting evidence connecting the two identities.

Providing a qualification certificate does not, by itself, mean that the qualification has been independently verified.

10.4. Verification Methods and Eligible Qualifications

RMTI verifies qualifications against the eligibility requirements established in its current **Registration & Qualification Standards**. Eligible qualifications must be satisfactorily verified before registration in the relevant professional discipline is confirmed.

Where an applicant relies on an eligible higher-level qualification, RMTI may also require evidence of appropriate foundation massage training in accordance with its published registration requirements.

RMTI may use one or more reliable verification methods, including:

1. Official awarding-body verification services.
2. Direct confirmation from the awarding organisation.
3. Direct confirmation from a training provider, where appropriate.
4. Certificate or candidate-number verification.
5. Official transcripts or award records.
6. Recognised qualification databases.
7. Other reliable independent sources.

Where direct confirmation is required, RMTI should, wherever practicable, obtain that information independently rather than relying solely on correspondence supplied by the applicant.

RMTI will distinguish between the organisation that delivered the training and the organisation that awarded the qualification. For eligible VTCT Skills/iTEC qualifications, the awarding organisation and specified qualification are the primary basis for eligibility. The training provider may also be recorded or checked where relevant to verification.

Eligibility and verification decisions must be based on published requirements and reliable evidence, not the commercial identity or professional affiliations of the training provider.

10.5. Verification Outcomes

RMTI will record one of the following outcomes for each qualification submitted for verification.

Verified

Sufficient reliable evidence has been obtained to confirm the required qualification information.

Only qualifications that have satisfactorily completed RMTI's verification process may be recorded as RMTI Verified.

Verification Pending

Additional information or confirmation is required before verification can be completed. RMTI may request further information from the applicant, awarding organisation, training provider or another appropriate source. Registration in the relevant discipline will not be confirmed until the required verification has been completed.

Unable to Verify

RMTI has been unable to obtain sufficient reliable evidence to verify the qualification. The applicant should be informed of the outstanding verification issue, whether additional evidence may be submitted and any applicable review process. An inability to verify a qualification does not necessarily indicate fraud or misrepresentation. Records may be unavailable, particularly for older qualifications or where awarding organisations have changed or ceased operating. A qualification that cannot be satisfactorily verified will not be accepted as verified for registration purposes.

10.6. Suspected Altered or Fraudulent Documentation

Where there are reasonable grounds to believe that qualification documentation has been falsified, altered or deliberately misrepresented, RMTI may suspend the verification process while the matter is investigated.

RMTI may seek direct confirmation from the relevant awarding organisation or another authoritative source.

Where deliberate falsification or material misrepresentation is established, RMTI may refuse the application, withdraw registration if already granted, and consider the matter under its Code of Professional Conduct & Ethics and Professional Conduct & Disciplinary Procedure.

Any decision must follow a fair process and be supported by appropriate evidence.

10.7. Additional Professional Qualifications and CPD

Registered therapists may submit additional professional qualifications for verification and inclusion in their RMTI professional records. Additional qualifications are subject to the same general verification principles before RMTI describes them as verified. RMTI distinguishes between:

Core Eligible Qualifications

Qualifications that satisfy the applicable requirements for membership and registration under RMTI's Registration & Qualification Standards.

Additional Verified Professional Qualifications

Other professional qualifications that have been satisfactorily verified and may be recorded on a therapist's professional profile. These qualifications do not independently establish eligibility for RMTI membership unless they meet the applicable registration requirements.

Continuing Professional Development (CPD)

CPD certificates, attendance certificates, short courses and other professional-development activities may be recorded separately as part of a therapist's learning and development history. Such activities must not automatically be presented as equivalent to formal professional qualifications.

Therapists must not use RMTI membership or registration to imply that RMTI has verified or recognised a qualification that has not completed the appropriate verification process.

10.8. Verification Records and Data Protection

RMTI will maintain an appropriate internal record of qualification verification. The record should provide a clear audit trail of:

1. The qualification and professional discipline.
2. The awarding organisation.
3. The evidence reviewed.
4. The verification method or source.
5. The date verification was completed.
6. The verification outcome.
7. The identity of the authorised reviewer or system completing the verification.

Qualification documentation and verification records must be stored securely and handled in accordance with applicable Irish data-protection requirements. Access must be restricted to individuals who require the information for legitimate RMTI registration, verification, governance or professional-conduct purposes.

10.9. Information Displayed on the RMTI Register

The public RMTI Register may identify the professional qualifications and disciplines that RMTI has verified. Only qualifications that have satisfactorily completed RMTI's verification process may be described as verified.

RMTI should publish only the information necessary to provide meaningful public verification of professional registration. Supporting documentation, including qualification certificates, transcripts, identification documents and internal verification records, will not be displayed publicly.

10.10. Responsibilities of Applicants and RMTI

Applicants and registered therapists are responsible for:

1. Providing accurate qualification information.
2. Submitting genuine documentation.
3. Responding reasonably to requests for additional evidence.
4. Providing any authority or consent reasonably required to complete verification.
5. Informing RMTI where information relevant to their qualification record is incorrect.

Failure to provide sufficient evidence may prevent RMTI from completing registration or verifying an additional qualification.

RMTI is responsible for applying its qualification-verification requirements consistently, fairly and independently.

Verification decisions must be based on reliable evidence rather than assumptions about an applicant, training provider, educational institution or professional affiliation.

Applicants must receive neither preferential nor adverse treatment because of where they trained.

10.11. Review and Quality Assurance

Applicants RMTI will periodically review its qualification-verification procedures to ensure that:

1. Verification methods and sources remain reliable.
2. Eligible qualification requirements remain current.
3. Verification records are maintained consistently.
4. Emerging risks of qualification fraud or misrepresentation are addressed.
5. Verification procedures remain proportionate, practical and effective.

Material changes affecting qualification eligibility should be reflected in RMTI's Registration & Qualification Standards and communicated appropriately.

QUALIFICATION VERIFICATION PRINCIPLE

RMTI does not simply collect qualification certificates. We verify the professional qualifications on which registration is based.

A qualification described by RMTI as verified means that sufficient reliable evidence has been obtained through its established verification procedures.

Verification must be consistent, independent and proportionate, supporting the credibility of RMTI membership and public confidence in the professional Register.

11. RECORDS & DATA PROTECTION STANDARD

11.1. PURPOSE

This Standard sets out the professional expectations for RMTI members when creating, using, storing, sharing, retaining and disposing of client and practice records. It is designed to support safe, professional practice, protect client confidentiality and help members meet applicable data protection responsibilities.

RMTI is an independent professional association for qualified massage therapists in Ireland. It sets professional standards for its members but is not the statutory data protection regulator. Members remain responsible for understanding and meeting the legal obligations that apply to their own practice.

11.2. Scope

This Standard applies to personal data and records handled in connection with professional practice, whether held on paper, electronically, in booking or practice-management systems, on mobile devices, in email or messaging systems, or by service providers acting on behalf of the practice.

Client records may contain health information. Health data is special category personal data under the GDPR and requires particular care and an appropriate legal basis for processing.

11.3. Core principles

Members should manage personal data in line with the core data protection principles: lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality; and accountability.

1. Collect and record only information that is relevant and reasonably necessary for professional practice.
2. Be clear with clients about what information is collected, why it is needed, how it is used, who it may be shared with and how long it is expected to be retained.
3. Keep records accurate, factual and sufficiently up to date for their purpose.
4. Protect records against loss, damage, unauthorised access, disclosure or alteration.
5. Do not keep identifiable personal data longer than is necessary for the purpose for which it is held.
6. Be able to demonstrate sensible, proportionate arrangements for managing personal data.

Members should adopt practical and proportionate arrangements for managing personal information, taking account of the size of their practice, the nature of the information held and the risks involved. These arrangements should enable members to understand what information they hold, why it is needed, where it is stored, who can access it, how long it is retained and how it is protected.

Where the nature or scale of processing creates higher risks, members should seek appropriate specialist advice and consider whether additional measures, such as a data protection impact assessment, are required.

11.4. Creating professional client records

Client records should be clear, relevant and professional. They should contain enough information to support safe and appropriate treatment and continuity of care without collecting unnecessary personal detail.

1. Record relevant consultation, health and treatment information accurately and objectively.
2. Record material consent decisions, changes to treatment and significant client communications where appropriate.
3. Distinguish fact from professional opinion and avoid speculative, judgmental or irrelevant comments.

4. Make corrections transparently so that the integrity of the record is preserved rather than obscuring the original entry.
5. Where photographs, recordings or other additional material are used, ensure there is a clear professional purpose and appropriate information and permission.

11.5. Transparency and lawful handling

Members should provide clients with clear privacy information appropriate to the practice. The lawful basis for processing must be identified under applicable data protection law. Where special category data such as health information is processed, an appropriate condition for that processing must also apply.

Consent to massage treatment and consent as a legal basis for processing personal data are separate concepts. Members should not assume that treatment consent automatically provides a data protection basis for every use of client information.

11.6. Confidentiality and access control

Client information must be treated as confidential. Access should be limited to people who genuinely need it for a legitimate professional or operational purpose.

1. Paper records should be stored so that they cannot be casually viewed, removed or accessed by unauthorised people.
2. Electronic records should use appropriate access controls, passwords and device or system security proportionate to the sensitivity of the information.
3. Shared devices and accounts should be avoided where they undermine individual access control or accountability.
4. Sensitive client information should not be left visible in reception, treatment or shared working areas.
5. Members should take particular care when sending health or other sensitive information by email, messaging services or other electronic channels.

11.7. Practice systems and third-party services

Where a member uses booking platforms, cloud storage, payment systems, practice-management software, accountants, administrative support or other third parties that process personal data, the member should take reasonable steps to understand how the information is handled and whether appropriate data protection and security arrangements are in place.

Members should know what client data they hold, where it is stored, who can access it and whether it is transferred outside the European Economic Area. Appropriate contractual and data protection arrangements should be used where required.

11.8. Sharing and disclosure

Personal data should not be disclosed simply because another person or organisation requests it. Before sharing client information, members should consider the purpose, authority and necessity of the disclosure and share no more than is reasonably required.

Information may sometimes need to be shared without ordinary client agreement where there is a lawful basis or legal requirement, including certain safeguarding, legal or serious safety circumstances. Any such disclosure should be necessary, proportionate and appropriately recorded.

11.9. Client rights

Clients have rights in relation to their personal data under data protection law. These can include rights to information, access, rectification, erasure, restriction, portability and objection, although individual rights are not absolute in every circumstance.

Members should have a practical way to recognise and respond to a data protection request and should not alter, destroy or conceal records because a client has requested access to them.

11.10. Retention and secure disposal

RMTI does not prescribe a single universal retention period for all client records. GDPR does not itself set one retention period for every type of personal data.

Members should establish and follow a reasonable, documented retention approach based on the purpose of the records, applicable legal requirements, professional responsibilities, insurance conditions and the potential need to establish, exercise or defend legal claims.

1. Review records periodically rather than retaining them indefinitely by default.
2. Retain identifiable information only for as long as there is a justified purpose.
3. Dispose of paper records securely, for example through appropriate confidential destruction.
4. Delete electronic records securely where they are no longer required, taking account of backups and duplicated storage where reasonably practicable.
5. Where a specific legal, insurer or contractual retention requirement applies, members should follow that requirement.

11.11. Personal data breaches

A personal data breach can include accidental or unlawful loss, destruction, alteration, unauthorised disclosure of, or access to personal data. Examples may include a lost client file, an email sent to the wrong person, compromised login credentials, stolen devices or records made accessible to unauthorised people.

Members should:

1. Act promptly to contain the incident and protect affected information.
2. Record what happened, the information involved, the people potentially affected and the action taken.
3. Assess the likely risk to affected individuals and seek appropriate data protection advice where necessary.
4. Where a personal data breach meets the legal threshold for notification, notify the Data Protection Commission without undue delay and, where feasible, within 72 hours of becoming aware of the breach.
5. Where a breach is likely to create a high risk to affected individuals, comply with any applicable requirement to inform them without undue delay.

11.12. Children and safeguarding records

Records relating to children require particular care. Privacy information should be clear and understandable, and safeguarding information should be recorded factually and handled in line with the RMTI Child Safeguarding Standard. Confidentiality must not be used to prevent a necessary and lawful safeguarding disclosure.

11.13. RMTI professional accountability

A serious or repeated failure to protect client confidentiality, maintain appropriate records or handle personal data responsibly may raise a question under the RMTI Code of Professional Conduct & Ethics and may be considered under the RMTI Complaints & Concerns Procedure or Professional Conduct & Disciplinary Procedure where appropriate.

RMTI consideration of professional conduct does not replace the role or powers of the Data Protection Commission or other competent authorities.

11.14. Related RMTI standards

1. Code of Professional Conduct & Ethics
2. Client Care, Consent & Confidentiality Standards
3. Child Safeguarding Standard
4. Scope of Practice & Professional Boundaries
5. Complaints & Concerns Procedure
6. Professional Conduct & Disciplinary Procedure

REVIEW

This Standard should be reviewed periodically and when material changes occur in data protection law, regulatory guidance, technology or professional practice.

12. RMTI REGISTER & REGISTRATION STATUS POLICY

12.1. PURPOSE

This policy explains how RMTI records, manages and communicates an individual therapist's registration status. The Register is one of the mechanisms through which RMTI gives professional membership public meaning: it allows the public, insurers and other stakeholders to confirm whether a therapist is currently registered and in good standing within the RMTI professional framework.

RMTI registration is professional registration within an independent professional association. It is not statutory registration and does not confer a protected title or statutory right to practise.

12.2. The RMTI Register

The RMTI Register will provide a reliable way to confirm whether a therapist currently holds active RMTI registration, remains in good standing and the professional disciplines for which RMTI has verified the required qualification.

The searchable public register is intended for the operational phase of RMTI. Before that functionality is introduced, RMTI may explain the register and registration model publicly without representing that a searchable register is already live.

12.3. Individual registration number

Once registration is approved and activated, each therapist will be issued an individual RMTI registration number. The number is personal and non-transferable and remains linked to the therapist's RMTI registration history.

A registration number does not by itself demonstrate that registration is currently active. Current status must be checked against the RMTI Register or confirmed by RMTI.

12.4. Registration statuses

RMTI distinguishes between formal registration statuses and internal administrative stages. Only formal registration statuses describe a therapist's current position on the RMTI Register.

Formal Registration Statuses

Status	Meaning
Active	The therapist has satisfied RMTI's applicable registration requirements, completed the required payment and holds current registration without restrictions.
Conditions Apply	Registration remains current but is subject to specified conditions or restrictions imposed through an applicable RMTI procedure.
Suspended	RMTI registration has been temporarily suspended under an applicable RMTI procedure. The therapist must not represent themselves as actively registered during the suspension.
Expired	The registration period has ended without successful renewal. The therapist is no longer actively registered.
Removed	Registration has ended following voluntary withdrawal or a formal RMTI decision. Ordinary non-renewal is recorded as Expired rather than Removed.

Internal Administrative Stages

RMTI may use the following internal stages to manage applications and renewals:

Stage	Meaning
Application Submitted	Application received. The applicant is not registered.
Under Review	RMTI is assessing the application and supporting evidence.

Further Information Required	Additional information or evidence is needed before a decision can be made.
Approved – Awaiting Payment	The application has been approved in principle, but registration is not yet active.
Renewal Due	The therapist remains within their current registration period but must complete renewal before the expiry date.

Internal administrative stages must not be presented publicly as formal registration statuses.

Active Registration and Renewal

Active registration confirms that a therapist has satisfied RMTI's applicable registration requirements and that their registration is current.

For initial registration, qualification verification and other applicable requirements must be satisfactorily completed before approval.

Approval alone does not establish active registration. Registration becomes active only when the applicable payment has been completed and RMTI has activated the registration record.

Registration normally operates for 12 months from the individual therapist's activation or renewal date.

Where renewal is not completed by the applicable expiry date, registration automatically becomes **Expired**.

An expired registration may be restored in accordance with the Continuing Registration & Renewal Policy, including the applicable **30-day restoration period**.

Registration is not considered active during any period of expiry.

Good Standing

A therapist is considered to be in good standing where they hold current active registration, meet the applicable continuing-registration requirements and are not subject to a suspension or restriction that prevents them from being regarded as in good standing.

A therapist whose registration is subject to conditions may remain registered, but those conditions must be appropriately reflected in their registration status.

Good standing does not require a separate administrative registration category.

12.5. Suspension, conditions and removal

RMTI registration status may change following a decision made under its Professional Conduct & Disciplinary Procedure or another applicable RMTI policy.

Any such change must follow the relevant procedure and be supported by an appropriate decision record.

Where conditions are imposed, registration may remain current, subject to the specified requirements or restrictions.

Suspension temporarily removes active registration status, while removal ends registration following voluntary withdrawal or an applicable RMTI decision.

Expiry resulting from non-renewal is distinct from suspension or removal.

RMTI will ensure that registration statuses accurately reflect the therapist's current position and that any public disclosure of conditions or restrictions is necessary, proportionate and lawful.

These measures affect RMTI membership or registration only. RMTI does not claim statutory powers to prohibit an individual from practising massage therapy in Ireland.

12.6. Voluntary removal and return

A therapist may ask to leave the RMTI Register. RMTI should record the effective date and reason category for voluntary removal. A later return will be managed under the applicable renewal, restoration or registration requirements rather than by simply reactivating an old status without checks.

12.7. Information held on the registration record

RMTI RMTI will maintain an appropriate internal registration record for each therapist.

This may include:

1. RMTI registration number and identity details.
2. Registration start date, renewal date and current status.
3. RMTI-recognised disciplines supported by verified core qualifications.
4. Verification records for core qualifications.
5. Insurance and CPD compliance information.
6. Renewal and declaration history.
7. Conditions, suspension, removal or restoration information where applicable.
8. A history of registration-status changes.
9. An audit trail of material decisions and the authority for them.

RMTI will preserve relevant registration history rather than overwrite previous statuses.

Where a therapist is restored or re-registers, their current status may return to Active while the underlying historical record is retained for legitimate governance, verification and audit purposes.

Registration records must be maintained accurately and securely in accordance with applicable data-protection requirements.

12.8. Information shown publicly

The public RMTI Register should provide sufficient information to allow members of the public, insurers and other stakeholders to identify a therapist and confirm their current professional registration status.

Information displayed may include:

1. Therapist's name.
2. RMTI registration number.
3. Current registration status.
4. RMTI-recognised registered discipline or disciplines.
5. Registration or renewal information where appropriate.
6. Conditions or restrictions where RMTI has determined that disclosure is necessary and lawful.

Public registration status must accurately reflect whether a therapist is currently registered, subject to conditions, suspended, expired or removed.

The publication of registration status is distinct from the disclosure of detailed disciplinary information.

Supporting documentation, including qualification certificates, identity documents, insurance documents, CPD evidence, complaints files and internal verification records, will not be displayed publicly. RMTI will process registration information in accordance with applicable data-protection requirements.

Public information will be limited to what is necessary for the purpose of the Register. Sensitive personal information and internal case-management records will remain subject to restricted access.

12.9. Accuracy and changes

Registered therapists must keep relevant registration information accurate and notify RMTI of material changes. RMTI may correct the Register where reliable evidence shows that information is inaccurate or a status change has taken effect.

Core verified qualification information and formal registration-status decisions should not be freely editable by the therapist. Changes should require RMTI review so that the Register remains an authoritative record.

12.10. Misrepresentation of status

A person must not represent themselves as actively RMTI registered when their application is pending, their registration has expired, or their registration has been suspended or removed. Misuse of an RMTI registration number, status or mark may be addressed under applicable RMTI procedures.

12.11. Relationship with other RMTI policies

This policy should be read with the Registration & Qualification Standards, Qualification Verification Policy, Continuing Registration & Renewal Policy, Professional Conduct & Disciplinary Procedure, Complaints & Concerns Procedure, CPD Policy and Professional Insurance Requirements, and the RMTI Registration & Application Process.

REGISTRATION PRINCIPLE

The RMTI Register provides a reliable means of confirming whether a therapist holds current professional registration and the disciplines covered by that registration.

Public registration information must accurately reflect the therapist's current status, including any applicable conditions or restrictions.

RMTI will maintain appropriate supporting records and registration history to ensure that the Register remains accurate, credible and accountable.

13. RMTI REGISTRATION & QUALIFICATION STANDARDS

13.1. Purpose

RMTI membership and registration are based on verified professional qualifications and a commitment to ongoing professional standards. Applicants must hold an eligible, regulated qualification, provide satisfactory evidence of their training and meet RMTI's membership requirements.

Admission to the RMTI confirms that the applicant has been assessed against these standards.

13.2. Current Qualification Standard

RMTI registration is currently open to graduates holding a specified regulated VTCT Skills / ITEC qualification at Level 3 or higher in one or more of the following disciplines:

- Holistic Massage — QN 603/4097/6
- Sports Massage — QN 603/4501/9
- Reflexology — QN 603/4094/0

These qualifications are regulated by Ofqual (the Office of Qualifications and Examinations Regulation) and form part of the UK's Regulated Qualifications Framework (RQF). They establish the foundation educational standard for RMTI membership.

Recognition of Higher-Level Qualifications

Applicants holding a regulated VTCT Skills/iTEC Level 4 or Level 5 Sports Massage qualification are also eligible to apply for membership without necessarily holding an iTEC Level 3 qualification.

A Level 4 Sports Massage qualification supersedes the requirement for an iTEC Level 3 qualification. Similarly, a Level 5 Sports Massage qualification supersedes the requirement for a Level 4 qualification.

However, applicants must have completed appropriate foundation training in massage therapy, which may have been obtained through another training provider or awarding organisation. RMTI may request evidence of this foundation training to establish that the applicant has completed an appropriate educational pathway.

The higher-level regulated qualification establishes eligibility for membership, while the foundation training demonstrates the necessary underpinning education and practical skills.

Additional Professional Qualifications

Once admitted to membership, therapists may submit additional professional qualifications for inclusion in their registration profile, as outlined in Section 6.

Holding an eligible qualification establishes the educational requirement for membership but does not automatically guarantee registration. All applicants must also satisfy RMTI's professional registration requirements.

13.3. Evidence of Qualification

Applicants must provide a photograph or scanned copy of their qualifying diploma or certificate.

RMTI may also request:

1. Awarding organisation details.
2. Qualification title and level.

3. Qualification Number (QN).
4. Date of award.
5. Training provider details.
6. Transcript or record of achievement, where required.
7. Evidence of foundation training, where applicable.
8. Additional information reasonably required to establish the authenticity and content of the qualification.

Applicants submitting additional qualifications for inclusion in their professional profile must provide appropriate supporting documentation.

Registration will not be confirmed until the required qualification evidence has been satisfactorily verified.

13.4. Independent Verification

Qualification verification is a fundamental requirement of RMTI registration. RMTI will not rely solely on an applicant's declaration that they hold a qualification.

Where reasonably possible, the qualification will be checked against information supplied by the awarding organisation, training provider or another reliable source.

The verification process is intended to establish:

1. The identity of the qualification holder.
2. The qualification awarded.
3. The awarding organisation.
4. The date of award.
5. Whether the qualification satisfies RMTI's published entry requirements.

Verified qualification information will form part of the member's professional registration record.

The detailed verification process is addressed separately in the **RMTI Qualification Verification Policy**.

13.5. Eligible Professional Disciplines

Members may be registered in each RMTI-recognised discipline for which they hold an eligible and verified qualification.

A member's professional registration record will distinguish between their qualifying disciplines and any additional professional qualifications.

Registration in one discipline does not imply qualification or RMTI recognition in another.

The public register will identify the professional disciplines for which a member has satisfied RMTI's registration requirements.

13.6. Additional Qualifications

Once a therapist has met RMTI's entry qualification requirements and been accepted for membership, they may submit additional relevant professional qualifications for verification and inclusion in their professional profile. These may include advanced qualifications, specialist training and qualifications in related therapeutic disciplines.

Where satisfactorily verified, these qualifications may be displayed on the therapist's public RMTI profile, providing a more comprehensive picture of their professional education, skills and areas of specialisation.

Additional qualifications do not independently establish eligibility for RMTI membership. Applicants must first satisfy the regulated qualification requirements identified in Section 2.

For clarity, the professional register will distinguish between:

Qualifying Qualifications: The regulated VTCT Skills/iTEC qualifications through which the therapist established eligibility for membership.

Additional Professional Qualifications: Further verified qualifications, advanced training and professional specialisations that contribute to the therapist's professional profile.

Verification of an additional qualification confirms that the member holds the stated qualification. It does not necessarily constitute RMTI endorsement of the training provider, course or qualification.

13.7. Qualifications not Currently Recognised

Qualifications outside the published entry requirements in Section 2 do not independently establish eligibility for RMTI membership.

This includes qualifications described by other organisations as equivalent, recognised or comparable unless RMTI has formally approved them as an eligible entry qualification.

Such qualifications may nevertheless be considered for inclusion in an existing member's professional profile under Section 6.

Any future changes to RMTI's recognised entry qualifications must follow the formal review and approval process outlined in Section 15.

13.8. Online and Distance-Learning Qualifications

RMTI recognises the importance of appropriate supervised practical education and assessment in hands-on therapeutic disciplines.

Qualifications completed wholly through distance or online learning, without adequate supervised practical training and assessment, will not normally satisfy RMTI's professional registration requirements.

Where necessary, RMTI may request additional information concerning the practical training and assessment undertaken as part of an applicant's qualification.

13.9. Professional Requirements for Registration

In addition to meeting the qualification requirements, applicants must:

1. Provide the information and evidence required by RMTI.
2. Have their qualifying professional qualifications satisfactorily verified.
3. Hold appropriate professional indemnity and public liability insurance.
4. Agree to comply with the RMTI Code of Professional Conduct & Ethics.
5. Agree to meet RMTI Continuing Professional Development requirements.
6. Practise within the scope of their qualifications and professional competence.
7. Complete any required professional declarations.
8. Meet all other published registration requirements applicable at the time of application.

These requirements form part of RMTI's commitment to maintaining professional standards, accountability and public confidence.

13.10. Professional Declarations

Applicants may be required to declare matters that could reasonably affect their suitability for professional registration.

These may include:

1. Relevant criminal convictions.
2. Findings of professional misconduct.
3. Disciplinary action by another professional organisation or register.
4. Restrictions placed upon professional practice.
5. Previous removal from a professional register.
6. Material insurance matters.
7. Other information reasonably relevant to professional registration or public protection.

The existence of such a matter will not necessarily result in refusal of registration.

Relevant circumstances will be considered fairly and individually in accordance with RMTI's published procedures.

13.11. Accuracy of Applications

Applicants are responsible for ensuring that all information supplied to RMTI is complete, accurate and truthful.

Providing false, altered, misleading or deliberately incomplete information may result in:

1. A request for further information.
2. Delay or refusal of an application.
3. Referral for consideration under RMTI's professional conduct procedures.
4. Suspension or withdrawal of registration where appropriate.

Where registration has been obtained through materially false or misleading information, RMTI may withdraw that registration following an appropriate review process.

13.12. Registration Decision

Meeting the published qualification requirements does not create an automatic entitlement to membership or registration.

RMTI must be satisfied that the applicant has met all applicable requirements and provided sufficient supporting evidence.

Applications may be:

1. Approved
2. Referred for further information
3. Deferred pending verification
4. Refused

Where an application is refused, the applicant will be informed of the reasons for the decision and any applicable review or appeal process.

13.13. RMTI Registration Number

Once an application has been approved and all applicable registration requirements completed, the therapist will be issued an individual RMTI registration number.

This number identifies the therapist's professional registration with RMTI and must not be transferred to or used by another person.

The therapist's registration status, recognised professional disciplines and verified additional qualifications will be capable of verification through the public RMTI Register, subject to the register's publication and privacy policies.

13.14. Maintaining Registration

RMTI registration is subject to continuing professional requirements and annual renewal.

To remain registered, members must:

1. Maintain appropriate professional insurance.
2. Complete the required continuing professional development.
3. Comply with the RMTI Code of Professional Conduct & Ethics.
4. Maintain accurate and up-to-date registration information.
5. Complete the required annual renewal declarations.
6. Pay the applicable membership or renewal fee.
7. Continue to satisfy RMTI's professional registration requirements.

Failure to maintain these requirements may result in suspension or removal from the professional register in accordance with RMTI's published procedures.

Detailed requirements are set out in the RMTI Continuing Registration & Renewal Policy.

13.15. Changes to Recognised Qualifications

Professional education, qualification frameworks and industry standards may change over time.

RMTI may therefore review and amend its recognised entry qualifications, professional disciplines and registration standards where appropriate.

Any proposed expansion of the qualifying entry requirements must be supported by a clear professional and educational rationale.

Such reviews may consider:

1. Other regulated qualifications from awarding organisations specifically approved by RMTI.
2. Qualifications obtained outside Ireland that are regulated, have a Qualification Number and appear on a National Framework of Qualifications.
3. Legacy qualifications.
4. Qualifications in additional massage or related therapeutic disciplines.
5. Changes to existing qualification frameworks or awarding-body requirements.

Any new entry qualification or registration route must be formally approved and published before applicants can rely upon it.

Where material changes are introduced, RMTI will provide appropriate information and, where necessary, transitional arrangements for existing members.

The recognition of additional qualifications for inclusion in a member's professional profile, as described in Section 6, does not constitute an amendment to RMTI's entry qualification requirements.

REGISTRATION PRINCIPLE

RMTI membership and professional registration represent more than the possession of a qualification.

They demonstrate that a therapist has met a clearly defined educational entry standard, that their qualifying credentials have been independently verified, and that they have committed to maintaining professional standards through continuing education, appropriate insurance, ethical practice and professional accountability.

Through these requirements, RMTI aims to strengthen the professional standing of its members, support their ongoing development and promote greater public confidence in massage therapy throughout Ireland.

© 2026 Regulated Massage Therapists of Ireland Limited (RMTI). All rights reserved.