



2 February 2012

Dr Robert Fendall  
Chair, Osteopathy Board of Australia  
Australian Health Practitioner Regulation Authority  
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MELBOURNE, VIC, 3001

Via email: [osteoboardconsultation@ahpra.gov.au](mailto:osteoboardconsultation@ahpra.gov.au)

Dear Robert

The Australian and New Zealand Osteopathic Council (ANZOC) welcomes the opportunity to provide feedback on the *Draft Guidelines for Clinical Records* public consultation paper released on 30 November 2011.

ANZOC supports the introduction of guidelines for clinical records and is generally satisfied with the principals articulated in the draft consultation paper. There is concern, however, that the principles are overly prescriptive and that the guidelines should refer to legislation already in existence, for example, privacy, rather than duplicate the requirements of such.

Of particular concern was the prescriptive nature of section 3. ANZOC considered the reference to the offer of a chaperone when a patient is required to undress might be construed to suggest that this is a requirement of practice when a patient is asked to partially disrobe and our view is that this does not reflect current standards of practice.

In the interests of clarity, ANZOC recommends that the principles contained in the draft guidelines be more clearly grouped to allow for an easy index system so that all guidelines pertaining to an individual subject item are grouped together. For example, quality and content of records, patient consent, collection of patient information, patient access to records, using and disclosing personal health information, data security and retention etc.

ANZOC would also like to draw the Board's attention to the Royal Australian College of General Practitioner's publication *Handbook for the Management of Health Information in Private Medical Practice* and Australian standards (available through SAI Global) that address health information both in paper and electronic format. These documents may provide useful additional references to the Board and registered osteopaths in implementing the guidelines.



Yours sincerely

A handwritten signature in black ink that reads "Rachel Portelli".

Rachel Portelli  
**Executive Officer**