



## Response template for: Osteopathy Guidelines for Clinical Records, and/or Guidelines: Clinical Record Keeping for Chiropractors

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7 March 2025

This response template is the preferred way to provide your response to the public consultations on:

- Osteopathy Guidelines on Clinical Records, and/or
- Guidelines: Clinical Record Keeping for Chiropractors.

Please provide your responses to all or some of the questions in the text boxes on the following pages. You do not need to respond to a question if you have no comment.

### Making a submission

Please complete this response template and send to **osteoboardconsultation@ahpra.gov.au** and/or **chiroboardconsultation@ahpra.gov.au** using the subject line 'Feedback on Clinical Records consultation'.

**Submissions are due by close of business on Friday 2 May 2025.**

The Board publishes submissions on its website to encourage discussion and inform the community and stakeholders.

Do you consent to the Board publishing your submission on its website?

- ☒ Yes  
☐ No

### Stakeholder details

Please provide your details in the following table:

<b>Name:</b>	Correne Bartlett
<b>Organisation Name:</b>	Health and Disability Services Complaints Office

### Submission for:

- ☐ Osteopathy Board – Osteopathy Guidelines on Clinical Records  
☐ Chiropractic Board – Guidelines: Clinical Record Keeping for Chiropractors  
☒ Both of the above.

## Your responses to the public consultation questions

1. Are the current guidelines necessary? Yes, No, Unsure?	Yes, <b>No</b> , Unsure
Please explain why.	
<p>As the Code of conduct provides appropriate guidance of the National Board's expectations, the current guidelines for clinical records keeping for chiropractors and osteotherapists may not be necessary.</p> <p>There does not appear to be any exceptional requirements, specific to chiropractors or osteotherapists when keeping patient health records, that are not already covered within the Code of conduct.</p>	
2. Do you agree with the proposal that the Board retires the current guidelines? That includes positioning the Code of conduct as the document to provide practitioners with guidance on health records management with supplementary information through new <a href="#">health record management resources</a> ? Yes, No, Unsure?	<b>Yes</b> , No, Unsure
Please explain why.	
<p>Retiring the current guidelines in favour of positioning the Code of conduct as the primary source of guidance for health records management will likely provide clarity on the requirements for keeping patient health records.</p> <p>Currently, the existence of specific guidelines for chiropractors and osteotherapists in addition to the Code of conduct's more general guidance on health records management may cause confusion for these health service providers.</p>	
3. Would retiring the guidelines have any potential negative or unintended impacts for Aboriginal and Torres Strait Islander Peoples? Yes, No, Unsure?	Yes, No, <b>Unsure</b>
Please explain why.	

Unable to comment on the potential negative or unintended impacts.

**4. If the current guidelines are retained, is the wording and language helpful, clear, relevant and workable? Yes, No, Unsure?**

**Yes, No, Unsure**

**Please explain why.**

Yes, if the current guidelines are retained, HaDSCO agrees that the wording and language is appropriate.

However, retaining the guidelines may cause confusion to health service providers. It would likely be difficult to distinguish the requirements for recordkeeping under the current guidelines and the guidance tools like the health records management resources which align with the Code of conduct.

As part of HaDSCO's service delivery, we have received complaints from patients regarding accessing medical records. Therefore, clarity regarding records keeping requirements will be beneficial to HaDSCO's service delivery.

**5. If the current guidelines are retained, is there any content that needs to be changed or deleted? Yes, No, Unsure?**

**Yes, No, Unsure**

**Please explain what should be changed.**

Yes, if the current guidelines are retained, HaDSCO considers that there would be benefits for the guidelines to be changed to align with the record management tools developed by the National Boards.

**6. The Board's Statement of assessment against Ahpra's Procedures for development of registration standards, codes and guidelines, included at Appendix B, identifies potential regulatory impacts from this proposal that the Board will take into account when considering whether to retire the guidelines or implement revised guidelines. Are there any additional potential regulatory impacts that the Board should also take into account?**

We do not foresee any additional potential regulatory impacts for this proposal.

**7. Do you have any comments on the Board's Statement addressing Patient and Consumer Health and Safety Impact, included as Appendix C?**

We do not have any comments regarding the Patient and Consumer Health Safety Impact.

**8. Are there any issues or concerns that the Board needs to be aware of when deciding whether or not to retire the guidelines?**

We do not have any other concerns.

**9. Do you have any other comments on the proposed options?**

No comments.