

Response template for: Osteopathy Guidelines for Clinical Records

7 March 2025

This response template is the preferred way to provide your response to the public consultations on Osteopathy Guidelines for Clinical Records.

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 using the subject line 'Feedback on *Osteopathy Guidelines for 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:

Name:	Antony Nicholas
Organisation Name:	Osteopathy Australia

Your responses to the public consultation questions

1. Are the current guidelines necessary? Yes, No, Unsure?	No
Please explain why.	
<ul style="list-style-type: none">When the guidelines were developed in 2012, they were useful; however, more appropriate resources now exist. Osteopathy Australia agrees with the Board's recommended Option One, which proposes to retire these guidelines.The content is already covered in more current codes or guidelines. In addition, Osteopathy Australia's website contains information about clinical records and informed patient consent. Osteopaths often contact us to clarify or determine the correct processes and procedures to maintain accurate clinical records.	

- It is inconsistent with other National Boards. The Ahpra health records management resources are more user-friendly, appropriate and consistent with other professions.
- It can be slightly confusing for registrants to understand or implement when reviewing other resources.
- The guidelines in their current form do not contain information about how long to keep clinical records. Osteopathy Australia often receives questions about this and has information about clinical record keeping on our website. Additionally, there is no advice or guidance on what to do if a practitioner has been subpoenaed to provide clinical records to the court. Once again, our website has information about what to do in these circumstances.
- In summary, Osteopathy Australia agrees there are no unique professional requirements for osteopaths that are not covered within the contemporary shared Code of conduct and the shared resources for managing health records.

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 osteopaths with guidance on health records management with supplementary information through new health record management resources? Yes, No, Unsure?	Yes
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Please explain why.

For all the reasons highlighted under question 1.

3. Would retiring the guidelines have any potential negative or unintended impacts for Aboriginal and Torres Strait Islander Peoples? Yes, No, Unsure?	Unsure
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Please explain why.

Osteopathy Australia does not have the required expertise or experience to comment on potential impacts on Aboriginal and Torres Strait Islander Peoples, and we recommend Ahpra seeks advice from appropriate Aboriginal and Torres Strait Islander stakeholders.

<p>4. If the current guidelines are retained, is the wording and language helpful, clear, relevant and workable? Yes, No, Unsure?</p>	<p>No</p>
<p>Please explain why.</p> <p>For all the reasons highlighted under question 1.</p>	
<p>5. If the current guidelines are retained, is there any content that needs to be changed or deleted? Yes, No, Unsure?</p>	<p>Yes</p>
<p>Please explain what should be changed.</p> <p>As noted under question 1, the guidelines in their current form do not contain information about how long to keep clinical records. Osteopathy Australia often receives questions about this and has information about clinical record keeping on our website. Additionally, there is no advice or guidance on what to do if a practitioner has been subpoenaed to provide clinical records to the court. Once again, our website has information about what to do in these circumstances.</p> <p>That said, and as noted under question 2, Osteopathy Australia agrees with the Board's proposal to retire the current guidelines.</p>	
<p>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?</p> <p>The only regulatory impact would be the inconsistency, when compared with other NRAS professions, of maintaining the current guidelines, rather than retiring them.</p> <p>Osteopathy has considerably lower rates of notifications than many professions in NRAS, as such, if this guideline is not being retired, further evidence would need to demonstrate why such a guideline has and/or will not be implemented in every other registered profession, or the need to update and amend the current Code of Conduct, immediately.</p>	

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

No, other than the issues raised above in question 6. If the removal of this guideline would impact patient or consumer health and safety, it is imperative for all other National Boards to demonstrate why they do not have an equivalent guideline or the need to update and amend the current Code of Conduct.

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

None, other than a clear communication strategy with registrants, as the retiring of the guidelines is a reduction in complexity and a direction that guidance on clinical records is held within the Code of conduct.

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

No