



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

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:

Name:	Annie Gibbins CEO
Organisation Name:	The Australian Traditional Medicine Society

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?	No
Please explain why.	

No. They are not necessary as the Code of Conduct contains sufficient guidance on what is required for record keeping. They are overly prescriptive and outdated. There are also recently developed shared record management tools. These, along with the Code of Conduct, cover the information in the current guidelines.

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 [health record management resources](#)? Yes, No, Unsure?

Yes

Please explain why.

Yes. The shared Code of Conduct and the shared record management resources are contemporary and comprehensive guides for record keeping.

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

No

Please explain why.

No. Cultural safety for Aboriginal and Torres Strait Islanders is not addressed in the current guidelines. In fact, the Code of Conduct uses the term 'culturally safe' with reference to taking patient histories and making clinical records. If practitioners practice in a culturally safe way, as described in the Code of Conduct, they would be likely to avoid potential negative or unintended impacts for Aboriginal and Torres Strait Islander Peoples.

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

No

Please explain why.

No. If retained, the wording and language would need to be revised. They are overly prescriptive. They also omit the important contemporary understanding of cultural safety in practice. For example, the guidelines refer only to collecting 'relevant social and lifestyle history including cultural background (where clinically relevant)'. There is no reference cultural safety as it applies to Aboriginal and Torres Strait Islander Peoples and peoples of other cultures.

They are also redundant as more appropriate guidance is already included in the shared Code of Conduct and the shared record management tools.

5. If the current guidelines are retained, is there any content that needs to be changed or deleted? Yes, No, Unsure?	Yes
Please explain what should be changed.	
<p>Yes. Suggest amalgamating detail in information to be recorded in initial consultations and new presentations and subsequent consultations.</p> <p>There needs to be an inclusion of a section on cultural safety, what it means and how it is incorporated in taking case histories and record keeping.</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>None identified.</p>	
7. Do you have any comments on the Board's Statement addressing Patient and Consumer Health and Safety Impact, included as Appendix C?	
<p>I support the Statement and its commitment to stakeholder consultation.</p>	
8. Are there any issues or concerns that the Board needs to be aware of when deciding whether or not to retire the guidelines?	
<p>None identified.</p>	
9. Do you have any other comments on the proposed options?	
<p>No further comment.</p>	