



Consumers
Health Forum
of Australia

3 January 2012

Executive Officer
Chinese Medicine Board of Australia
Australian Health Practitioner Regulation Agency
GPO Box 9958
MELBOURNE VIC 3001

Dear Sir/Madam

Consultation paper on proposed Codes and Guidelines – Chinese Medicine Board of Australia

The Consumers Health Forum of Australia (CHF) welcome the opportunity to respond to the Australian Health Practitioner Regulation Agency's (AHPRA) consultation paper on the proposed *Codes and Guidelines* relevant to the Chinese Medicine Board of Australia (the Board).

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians.

Health practitioner regulation, and its contribution to the safety and wellbeing of health consumers, is an area of considerable interest to CHF, and CHF is supportive of national registration standards. Some brief comments on the Codes and Guidelines are provided below.

Proposed Codes and Guidelines

CHF has previously welcomed the establishment of a National Registration and Accreditation Scheme (NRAS) for health professions as we believe it will improve safety and quality in healthcare, we have also argued in many previous submissions that consumers must be involved in all aspects of the NRAS. A national approach to healthcare including registration, accreditation and health complaints will work towards reducing the existing inconsistencies occurring throughout the states and territories.

CHF also supports common National Board Codes and Guidelines including:

- Advertising guidelines
- Code of conduct for registered health practitioners
- Guidelines for mandatory notifications.

CHF indicated its support for the Codes and Guidelines in previous submissions related to the 10 health professions covered by NRAS as of 1 July 2010. As the preliminary drafts for the common National Board Codes and Guidelines were subject to public consultation prior to their implementation in July 2010 we are comfortable that they are also applicable to Chinese Medicine practitioners. CHF is not aware of any profession-specific guidance that needs to be included in the Codes and Guidelines for Chinese Medicine health professionals.

The proposed changes to the Advertising Guidelines are supported by CHF. It is essential that Chinese Medicine Practitioners who use the title Professor or Associate Professor do so without misleading consumers. CHF supports the Board's right to investigate any practitioner who may be using these titles illegitimately.

CHF welcomes the proposal to modify the Code of Conduct to ensure better communication between practitioner and consumer. The expansion of the section of the Code that considers effective communication to include a recommendation that practitioners encourage consumers to provide comprehensive information about their current condition and management should result in better outcomes for consumers.

CHF is supportive of the proposed requirement that all patient records be written in English. Ensuring that both consumers and other medical practitioners can understand clinical records is essential in ensuring ongoing quality care. Adequate and accurate record keeping in English should be a clearly specified requirement for all health practitioners in relevant Codes of Conduct.

CHF considers that there is value in the registration of health practitioners involved in work that affects the treatment of consumers, to ensure that patient safety is prioritised. The Codes and Guidelines support this.

CHF looks forward to the outcomes of the consultation. Should you wish to discuss this submission in more detail, please do not hesitate to contact CHF on 02 6273 5444.

Yours sincerely



Carol Bennett
CHIEF EXECUTIVE OFFICER