

19 December 2011

Executive Officer  
Chinese Medicine Board of Australia  
AHPRA  
GPO Box 9958  
Melbourne VIC 3001

To whom it may concern

**Re: Submission from the Health Quality and Complaints Commission on the Consultation Paper of 21 November 2011**

Thank you for the opportunity to provide comment on the above consultation paper, which discusses proposed guidelines and a code for practitioners of Chinese Medicine in regard to advertising, conduct, mandatory notifications and patient records.

**About us**

The HQCC is an independent statutory body dedicated to improving the safety and quality of healthcare in Queensland. To prevent patient harm and improve healthcare quality we:

- Manage healthcare complaints
- Investigate serious and systemic issues and recommend quality improvement
- Monitor, review and report on healthcare quality
- Identify healthcare risks and recommend actions
- Share information about healthcare safety and quality
- Promote healthcare rights

**Advertising guidelines**

- We support the proposed addition of the section on use of the titles 'Visiting Professor', 'Adjunct Professor', 'Distinguished Professor' and 'Honorary Professor' by Chinese Medicine practitioners.
- However, we disagree with the proposal that this section replace the section on Psychologist's use of the term 'doctor'. We believe that the Psychology Board of Australia's grounds for stipulating the term 'doctor' i.e. that this term not be used by registered Psychologists unless they hold a doctoral qualification, are valid.

We therefore suggest both sections (as described above) be included in the final version of advertising guidelines.

## **Code of conduct for registered health practitioners**

- We support the proposed change to section 3.3 Effective Communication, as the new text is more comprehensive.
- The New South Wales (Health Care Complaints Commission) Code of Conduct for Unregistered Health Practitioners, which was developed to provide a form of regulation for practitioners of alternative and complementary therapies in that state in the absence of another regulatory instrument, includes a clause on infection control. Specifically, the Code states:

*'A health practitioner must adopt standard precautions for the control of infection in his or her practice'.*

We note the current Code of Conduct for Registered Health Practitioners does not include a similar statement about infection control. We believe this would be a worthwhile addition to the Code as it is applicable to all healthcare settings and may not be a topic consistently taught to practitioners of Chinese Medicine. A brief explanation of or reference to further information on standard precautions, should also be considered for inclusion.

## **Guidelines for mandatory notifications**

- We support the application of the existing guidelines to Chinese Medicine practitioners and have no further comments to make about these guidelines.

## **Draft guidelines for patient record keeping**

- We believe that patient records should be mandated to be in English. The reasons supporting this mandate relate to issues of patient safety (e.g. other health practitioners being able to read and understand the record at any point in time), which we consider outweigh the possible benefit of greater accuracy.

Should you have any queries, please do not hesitate to contact us on (07) 3120 5999 or by email [info@hqcc.qld.gov.au](mailto:info@hqcc.qld.gov.au), post or fax.

Kind regards



**Adjunct Professor Cheryl Herbert**  
**Chief Executive Officer**