
From:**Sent:** Friday, 2 November 2012 8:17 AM**To:** chinesemedicineconsultation**Cc:****Subject:** Infection control guidelines for acupuncture practice -Public consultation paper

Dear Sir/Madam,

I refer to your recent email to Council requesting feedback on draft infection control guidelines specific to acupuncture practice. The following comments are provided in response to the 4 specific questions outlined in your email.

1. Given that the Chinese Medicine Board accredits acupuncturists on a national basis Council considers the NHMRC document would be the most suitable for national use. Notwithstanding this, prescriptive state based legislation should take precedence where applicable. It is noted that in NSW acupuncturists registered with the board have been exempted from state legislative requirements.
2. Part 2b of the guideline provides that a practitioner may use alcohol hand sanitiser in place of soap and water, and that a hands free operated sink or alcohol sanitiser must be located in the clinic, but not necessarily in the treatment area. Council would recommend that practitioners be required to have access to a hands free sink which also provides warm water, liquid antibacterial soap and paper towels within the treatment area. The alcohol sanitiser could then be used following effective hand washing.
3. Council would recommend that the CMBA develop a standalone guideline which does not require reference back to the NHMRC document. This guideline should follow the order of typical procedures in an acupuncture clinic and contain graphics illustrating certain processes. It is recommended that this document be distributed to businesses in a printed rather than online format to ensure it is readily available within the premises.
4. Generally Council would recommend that information provided to practitioners be presented in a more concise manner which is easier to follow. Consideration should also be given to the development of multilingual content.

Regards,

Mark Gillespie
Environmental Health Officer



www.holroyd.nsw.gov.au