

26th July 2011

Dr. Robert Fendall
Chair
Osteopathy Board of Australia

Dear Dr. Fendall,

Re: Guidelines for Infection Control

The Chiropractic & Osteopathic College of Australasia (COCA) welcomes the opportunity to comment on this proposed guideline.

The College recognises the imperative of ensuring protection of the public, in its various forms, by the issuance of registration standards and guidelines.

In general the College wishes to congratulate the Osteopathy Board of Australia (OBA) on the formulation of these guidelines. COCA understands that while these guidelines may appear more germane to specific health professions, such as medicine and those normally associated with skin penetration, all health professions where there is a risk of cross infection from patient to patient or practitioner to patient, should follow appropriate infection control procedures.

COCA suggests, that in addition to the link to the NHMRC (2010) Australian Guidelines for the Prevention and Control of Infection in Healthcare, that the Board issues a brief summary of infection control and protection relevant to the practice of osteopathy. In particular, COCA suggests that the Board make reference to infection control and prevention measures such as regular hand washing, cleaning of treatment tables and replacement of treatment table head piece paper etc. Furthermore, it is suggested that where osteopaths employ ancillary techniques, such as dry needling or acupuncture, that an appendix to the guidelines be drafted, which specifically describes appropriate infection control and prevention guidelines for these skin penetrating techniques.

Recommendation:

That the guidelines include a summary of infection control and protection procedures and practices relevant to osteopathic practice and in circumstances where osteopaths include in their practice skin penetrating techniques, such as acupuncture or dry needling, more specific infection control guidelines be published.

COCA is also of the view that due to the close personal contact that may occur between osteopaths and their patients, in the course of treatment, that all osteopaths engaged in clinical practice should follow the recommendations for allied healthcare workers outlined in NHMRC (2010) Australian Guidelines for the Prevention and Control of Infection in Healthcare. All healthcare workers are obliged to adopt and follow an evidence based approach to practice and to follow best practice guidelines. This obligation overrides a practitioner's personal beliefs and values. Further, the Board's "Osteopathy Code of Conduct" states "Practitioners have a responsibility to protect and promote the health of individuals and the community" and must have an "understanding of the principles of immunisation against communicable diseases".

Recommendation:

That in order to fulfil their role as primary healthcare providers and to comply with the Board's "Code of Conduct" all osteopaths, engaged in clinical practice, should follow the immunisation recommendations for the prevention and control of communicable diseases, as outlined in NHMRC (2010) Australian Guidelines for the Prevention and Control of Infection in Healthcare.

It is also noted that the link to NHMRC (2010) Australian Guidelines for the Prevention and Control of Infection in Healthcare, appears to be broken. The current accessible link is:
http://www.nhmrc.gov.au/files_nhmrc/publications/attachments/cd33_complete.pdf

We hope, as part in this consultation process, you find our comments helpful in your deliberations.

Yours sincerely,

A handwritten signature in black ink, appearing to read "John W Reggars". The signature is fluid and cursive, with a long, sweeping tail that extends to the right.

John W Reggars DC, MChiroSc.
CEO/Vice President