



15 February 2013

Dr Robert Fendall  
Chair  
Osteopathy Board of Australia  
GPO Box 9958  
MELBOURNE VIC 3001

Dear Dr Fendall,

### **Draft Informed Consent Guidelines for Osteopaths**

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to comment on the Osteopathy Board of Australia's *Draft Informed Consent Guidelines for Osteopaths* Consultation Paper (the Draft Guidelines).

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

CHF has a strong interest in strengthening informed consent practices, and our comments are based on dedicated consultations with members focusing specifically on informed consent.

CHF believes that the Draft Guidelines would be strengthened by amendments to the document's definition of informed consent to reflect the fact that the wishes of the consumer must be respected. We recommend the inclusion of the following text:

*Informed consent is an agreement or process by which the rights of individuals to agree or to refuse treatment are upheld. In practical terms, informed consent refers to the process by which a health care provider informs a consumer of their treatment options, and associated risks and benefits, and supports them to make a decision about their care.*

CHF also recommends that the definition acknowledge the fact that consumers require not only information about their range of choices, but also about the likely outcomes of each one. This means that consumers would require information about:

- *Options* – available options, including the option to defer treatment.
- *Outcomes* – expected outcomes associated with each option, including the known complications or side-effects.
- *Incidence* – if available, statistical rates at which the treatment is successful and known complications occur.

Although we hope to see amendments to the definition of informed consent adopted by the Draft Guidelines, CHF welcomes the document overall. In particular, we support the detailed aspects of the Draft Guidelines relating to:

- Why informed consent is necessary
- Principles of informed consent
- How to obtain informed consent
- How to explain proposed treatment risks
- Documenting the patient's informed consent.

CHF also welcomes the emphasis that Draft Guidelines place on ensuring that consumers understand the information that has been communicated to them, and the focus on treating informed consent as an ongoing process rather than a one-off activity.

CHF appreciates the opportunity to provide input into this consultation. Should you wish to discuss these comments in more detail, please contact CHF Policy Manager, Ms Maiy Azize, on (02) 6273 5444.

Yours sincerely,



**Carol Bennett**  
**CHIEF EXECUTIVE OFFICER**