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**Osteopathy Board of Australia (OBA)
Sexual and Professional Boundaries:
Guidelines for Osteopaths**

**Submission by the
Australian Osteopathic Association
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The Australian Osteopathic Association (AOA) appreciates this opportunity to comment on the Osteopathy Board of Australia (OBA) Draft- Sexual and Professional Boundaries: Guidelines for Osteopaths. We note with some concern the high number of consultations released by the OBA in December with a closing date in January or early February and the impact this may have on effective or inclusive consultation.

The Australian Osteopathic Association

The Australian Osteopathic Association (AOA) is the national professional body representing over 85% of osteopaths across Australia. This gives us a unique voice for representing the profession and lobbying to ensure high industry standards are established or maintained.

Our core work is liaising with state and federal governments, regulatory or other statutory bodies and key stakeholders, such as Universities. As such we always welcome opportunities for input or collaboration, such as this.

This Submission

It is generally acknowledged that if guidelines are to be effective and enforceable they must be clearly understood and directly applicable to those being regulated and not be open to varied individual interpretation and/or application.

The AOA congratulates the OBA for developing this guideline and we offer the following suggestions to ensure the guideline is understandable, enforceable and applicable to the practice of osteopathy in Australia. Overall the guideline is comprehensive and well-structured, relating to an extremely important and often misunderstood part of clinical practice and professional conduct.

The AOA has some concerns as it appears to confuse the issue of treatment of sensitive areas or internal techniques; with the separate issue of professional or sexual boundaries. Both guidelines are needed but should be separate and individual. The AOA calls on the OBA to develop specific guidelines in regard to treatment of sensitive areas and internal techniques.

Understanding and defining sexual boundaries

The AOA considers much of this and following sections use broad and undefined terms. Such broad ranging statements fail to give due consideration to a situation where sexual partners then become patients of osteopaths and to more clearly define what constitutes sexual misconduct between practitioners and close relatives of a patient.

Jurisdictional Requirements

The AOA considers the guideline could be improved by the addition of a jurisdictional table that highlights:

- Age of consent laws in each state; and
- Working with children requirements in each state.

Professional standards in physical examinations should be a separate guideline

Including this section under these guidelines is confusing. As stated earlier the AOA considers the treatment of sensitive areas or internal techniques to be a separate issue to professional or sexual boundaries. Both guidelines are needed but should be separate. **The AOA calls on the OBA to develop specific guidelines in regard to treatment of sensitive areas and internal techniques.**

Such guidelines should address specific informed consent processes and documentation, patient modesty concerns, clinical record keeping guidance, chaperones and the use of gloves.