

Submitted by email on 1 September 2008

Dear Ms Nardi

I refer to your letter of 13 August 2008 in relation to the consultation paper on issues supplementary to the Intergovernmental Agreement.

The Board has reviewed the paper and would like to make the following comments:

4.7 Confidentiality provisions

The legislative process needs to be cognisant of the need for affected members of the public to access relevant data or information. This may be in relation to persons making complaints or who have made complaints against a registered osteopath or an osteopath who has reason to access data or information collected or who is suspicious that such data may exist or may need vetting.

4.10 Fees

It is important that the costs are appropriately allocated to ensure that smaller boards with a small number of complaints do not end up subsidising Boards that have a large number of complaints.

5. National Boards

The skills of non profession members are not specified. The Board considers that the National Board would be enhanced by the inclusion of a legal member.

General

National registration standards should reflect the highest level for each jurisdiction and profession. Any lower standards should be Grandfathered in but from 1 July 2010 the highest standard needs to apply.

If you have any queries, please do not hesitate to contact me.

Yours sincerely

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