

19 April 2021

Low Back Pain Clinical Care Standard Public Consultation  
Australian Commission on Safety and Quality in Health Care  
GPO Box 5480, Sydney NSW 2001  
Via email: [ccs@safetyandquality.gov.au](mailto:ccs@safetyandquality.gov.au)

Dear Clinical Care Standards Team,

The Royal Australian College of General Practitioners (RACGP) thanks the Australian Commission on Safety and Quality in Health Care (the Commission) for the opportunity to comment on the draft *Low Back Pain Clinical Care Standard*.

The eight draft quality statements are acceptable. We provide comments and suggestions for the Commission's consideration.

#### **General comments**

##### **Documenting the patient consultation**

In general practice, thorough and appropriate consultation notes will not detail all elements of discussions with the patient. GPs only note the important summary points, and any advice provided to the patient. These notes assist the GP in subsequent consultations, and for any potential medicolegal purposes.

The RACGP recommends clarifying this where relevant, within the document.

##### **'Locally approved policies'**

The RACGP recommends clarifying or re-wording the term 'locally approved policy.'

This term suggests a uniform approach to patient management. This is only possible when healthcare providers are in agreement on the basis of good quality evidence-based guidelines. If decisions have to be made outside the scope of available clinical evidence, then the GPs clinical autonomy, best judgement and previous experience is reasonable. Treatment decisions should be made as part of a shared decision-making process with the patient, considering the patient's personal preferences and appropriateness for their individual circumstances.

##### **Recommended tools**

The evidence-base for some of the recommended tools is unclear.

The value of using a particular tool may also differ across clinical practice settings, so it should be noted that considerations for each individual context needs to be made before using a particular tool.

#### **Quality statement 8 – Review and referral**

The RACGP recommends including additional wording in this quality statement around when it is appropriate to refer to allied health practitioners.

We hope this information is of assistance, and the RACGP thanks the Commission for the opportunity to provide comment on this consultation. For any enquiries regarding our response, please contact Stephan Groombridge, e-health and Quality Care manager on 03 8699 0544 or [stephan.groombridge@racgp.org.au](mailto:stephan.groombridge@racgp.org.au)

Yours sincerely



**Dr Karen Price**  
President