Attention: Chair
Chiropractic Board of Australia'
chair@chiropracticboard.gov.au

Dear Chair,
Please consider my following comments on the Code and Guidelines Documentation.

Overall:
The document that is to represent the National Board Guidelines for the Chiropractic Profession are concerning. As a practicing chiropractor, I am concern that a strong part of this particular documentation has NOT been consulted with members, board representation and Chiropractic Associations that REPRESENTS this profession's diversity.

The STRENGTH of this profession has always been on the diversity of its practitioners and their insights and ability to build stronger scientific evidence and research in this profession (just as multicultural ethnicity brings about racial integration in various multicultural nations such as Australia.)

This document seems to represent the VIEWPOINT of a singular source / group within the profession is not only UNJUST but creates a BIAS representation. To implement a document to regulate a profession in AUSTRALIA which offers its citizens the right to choose and freedom it promotes would be a disgrace to the foundation of this country and its government.

The document overall tone was demeaning to the profession and everyone in it. At first glance, the document was suppose to regulate and provide GUIDANCE to the profession.... as a PROFESSION document. However, the tone, the wording, and the phraseology used seems more like a TEACHER telling the rules to kindergarden kids running around in a playground.

I understand that the reasons for these guidelines. I understand the protection of the public. I also understand that there are several "bad seeds" and incidents in our profession that forced the board to create a document such as this (to help prevent them from occurring again). However, is this not true for all professions? Medicine? Physiotherapy? Nursing? Are these guidelines a REACTION to a small number of individuals in the profession? Should some of these problems arise, should it not and have been dealt individually on a case by case basis as they are so infrequent and should not be represented in a document like this?

I believe that more time is needed to develop these guidelines and it requires more careful input and consultation with "wide-ranging" opinion and representation of this profession before such a detailed and restrictive guidelines is used. This document is completely different than the current guidelines that is used within each state, and to implement such drastic change within such a small window of opportunity to comment leaves me wondering whether we are meant to effective have a say on this matter or just simply accept the opinion of a few to make the "rules" on how a profession should practice after all the history of this profession?

Specific comments on the document....please consider the following:

2.3 Advertising

The wording of this part of the guidelines effectively suppresses the freedom of speech of anyone - mentioning "chiropractic", third party reports / cases even in private discussions.

2.10 Working with adults and children

"Not recommended" - is this a regulation of NON-PRACTICE vs. guidelines for practicing chiropractors? I would like to ask what evidence is the Board considering to make such a statement? The "lack" of evidence - has the board considered ALL evidence with regards to children and chiropractic? Or only the ones that fit the model that created this guideline? Is there evidence that shows that chiropractic is ineffective for children? Is this Evidence Based or is it SELECTIVE Evidence Based? In addition, why are CHILDREN being isolated here?

2.11 Duration and Frequency of care

"*The primary goal of chiropractic care is to promote and optimise good health and function, maintain it, and prevent the recurrence of injury and dysfunction"*

Where does this definition come from? Is this part of the professional definition that was created from for this documentation? Who was consulted on the definition of chiropractic?

4.1 Reporting other practitioners

This part of the document is only setting an internal battle / conflict among chiropractors and will not only split the profession into fragments (like it is in the United States and other parts of the World) but will take it to a level of creating false claims, dishonoured reputations, undue hardships on families of chiropractors falsely accused etc. The wording of this can easily allow a simple "HEARSAY" to create a financial strain on the government, the legal system, the board's regulation, the chiropractors etc. It is a no-win situation for everyone including the consumer.

5.1 Spinal Screening

I have never accepted a fee for spinal screening, however, should a chiropractor choose to run a BUSINESS, I am not sure why they are not allow to charge a FEE for their services provided. Why is a donation okay and not for a fee?

General Code of Practice for Health Professionals

8.12 Financial and Commercial Dealings

As chiropractors operate a business in a local community, we are also often part of the community that we practice in. The code of practice states in the documents will prevents any chiropractors to have any business relationship with its clients and become a consumer of its own community. How

does this make local community develop? Does a chiropractor then have to business relationship a town outside its community (this would apply especially in small towns)?

The acceptance of gifts is of the free will of its clients not the practitioner. The ability to choose to give a gift of the client is the of the free will of the client. I am not sure how this should be dictated here.

9.0 Practitioner Health

Attending a General Practitioner to meet health needs and enforcing the need to immunize should be the FREEDOM and CHOICE of the Practitioner and should not be enforced here. How I care for my health and the choices I believe is "healthy" practice is the right that I have as a human and should not be dictated or regulated or enforced as a registration for a profession. I strongly disagree here on how we should be regulated on what is "Healthy" and what is not.

Please consider these comments to reflect that we need more representation and consultation on these code and guidelines.

Laurence Tham D.C.
Belridge Chiropractic
08 9401 0777