Comments to Code of Conducts

Mario Ferraro to natboards 08/04/2010 03:30

Attention: Chair,

Chiropractic Board of Australia

RE: Draft Code of Professional Practice for Chiropractors in Australia

Dear Chair,

Please consider my comments regarding the Board Code for Professional Conduct for Chiropractors in Australia.

General Comments:
While I can understand the Board's push to have these guidelines ready for the July 1 changes, there has been inappropriate time allocated to peruse and make comment on the proposed guidelines. Considering the Code of Conduct for chiropractors affects all currently registered chiropractors in Australia, an appropriate period of time should have been allocated. This imperative by the National Board has been perceived by many to indicate that the Board is acting to further their own agenda and grossly restrict what say chiropractors have. The overall composition of the document is flawed, and conveys the impression of a work that was rushed together, and clearly lacks evidence of consultative processes. Further to the above, the overall tone and attitude of the Code for Chiropractors is demeaning, restrictive and shows an immense amount of lack of respect for practicing chiropractors. While the primary objective of the code should be the protect the Australian public from harm, restrictions such as those put forth, have the potential to further cripple our already struggling, cash-strapped public health care system. Methods to help chiropractors ensure the long-term health of the public should be implemented, not methods to limit what they can do. No other National Professional Board has deemed it imperative to include such broad-ranging restriction and defining guidelines on their specific professions. Every other profession, bar the Chiropractors Board of Australia, have left their professions open to regulation under the terms of the Code of Conduct for registered health professionals which is fair and general. The Chiropractors Board of Australia appears to have relied heavily on pre-existing guidelines that were developed and implemented without appropriate consultation in an attempt to control a very small number of past complaints. It is unreasonable for the Chiropractors Board of Australia to inflict retaliatory guidelines on the entire profession assuming that they need "further guidance." The National Draft guidelines have been adopted from those developed defensively in specific jurisdictions to attempt to stop the particular activities of a small number of individuals in those jurisdictions at a particular time and does not reflect the integrity that the vast majority holds within the profession.

Duplication of Items:
There is noticeable duplication between the Code of Conduct for Chiropractors and the Code of Conduct for registered health professionals. It is puzzling and unclear if the National board will prosecute under the wording of the chiropractic code or the registered health professionals code.

Specific Problems
<u>Code of Conduct for registered health practitioners</u>
8.12 Financial & commercial dealings
c.) not accepting gifts from patients or clients other than tokens of minimal value such

as flowers or chocolates and if token gifts are accepted, making a file note or informing a colleague where possible.

It would be virtually impossible to monitor. The fact that you accept gifts but restrict the size of the gift is a contradiction – either accept gifts of any size or prohibit the acceptance of gifts.

9.2 Practitioner Health
c.) *understanding the principles of immunisation against communicable diseases and being immunised against relevant communicable diseases*

In our free society forced medication should not be a condition of registration. Does this mean if I choose not to immunise myself against the upcoming seasonal flu or whichever media-driven disease is around at the time, I may face loss of registration? Does this condition allow me the freedom to choose non-medical approaches to immunization such as homeopathic?

Code of Conduct for chiropractors in Australia
2.10
Overly prescriptive and demeaning.

2.10.7

This is no different for any other group of the population – It is standard practice in many health care disciplines to undergo examination in an asymptomatic state. Why single out children? The majority of procedures used in health professions have insufficient evidence of a gold standard nature. Just because there were some complaints in a few jurisdictions about a few practitioners it is not necessary for the National Board to take a heavy handed approach to the entire profession across Australia.

The lack of support for regular children's checks from current evidence is not sufficient to have such a repressive statement in the guidelines. There is not much evidence for most of what is performed across all health professions so chiropractors should not be treated any differently. There is no evidence that they don't have a benefit. No other profession restricts its members in such an oppressive manner by suggesting that something is "Not recommended"

4.1 Reporting other practitioners
This code has the potential to have devastating long-term effects on the entire profession and health-care in Australia. These requirements, in particular the requirement to report one's peers based upon a consumers viewpoint, has the potential to destroy the lives of countless chiropractors and fragment the profession with frivolous claims.

Recommendations:
Please consider the consequences of your actions and the overall effect it will have not just on the chiropractic profession, but on the Australian people you desire to protect.

Thank-you for time in reading this response,

Mario Ferraro - Chiropractor