April 7th, 2010

Chiropractic Board of Australia

Attention Chair

I am writing this reply with some haste and a feeling that I am not fully conversant with the proposed changes to the board practice code and guidelines. The reason for this being that I am currently in Thailand, on vacation and only recently received notification of these changes via email from a colleague.
This very state of affairs would seem to highlight the first of my concerns regarding the process of change being attempted by the board. I believe it is a requirement of the board registration statutes that any proposed changes provide adequate time for members and registrants to peruse, discuss and understand the proposed changes and their ramifications. Once fully digested registrants can then send their measured response to the board for consideration. I am not of the opinion that I have been given this opportunity and therefore, I doubt the validity and legality of this process.

Secondly, I am concerned with Section 9.2 (c) dealing with practitioner health. This clause seems to state that, not only must I have an understanding of the principles of Immunization, **but, I must" be immunized against relevant communicable diseases."**
Is the board attempting to deny me my rights as a natural individual? Here, again I question the legality of this document and this process. I would consider it my duty to legally challenge such a directive should it be enacted. **I would urge the CAA to challenge the proposed changes on a legal basis** rather than the coexisting moral and ethical questions.

Thirdly, it seems that the Chiropractic board is seeking to apply **excessive restrictions upon the profession** going well beyond that which all other professions deem sufficient. Is it in the best interest of our wonderful profession to place unnecessary burden upon practitioners in the delivery of our services? I think not! The cross-profession codes and guidelines allow for scrutiny and, if warranted, action in ensuring safe and ethical practice standards are maintained and adhered to. I for one believe the board has the ability and intelligence to address existing challenges and to handle emerging challenges without these **punitive** additions to regulation.

In closing, I would like to implore the CAA to take the strongest possible action to stop this current attack upon Chiropractic scope of practice. I intend to rejoin the CAA immediately upon my return to Australia so that I can bolster the representative power of the association.

Regards,

Dr. Bernard A Love (B.App. Sc Chiro)