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Wednesday, 7 April 2010

Dear Dr Donato,

Re: National Registration proposed Codes and Guidelines

Having read the Draft Code of Professional Practice for Chiropractors, it is with great concern for the future of chiropractic that I write this submission.

As a practicing chiropractor I am concerned that this proposal will severely limit the scope of practice of Australian chiropractors and is demeaning to our profession at large.

I have further concern that the majority of our profession has not had the opportunity to respond to this document. I only became aware of it one week ago. I have since spoken with colleagues who were unaware of it. This is not acceptable when this document threatens how the majority of Australian chiropractors currently practice. I feel this document does not reflect the majority of our professions' views and that our profession is entitled to adequate opportunity to respond. I would request an extension be granted to enable chiropractors to respond so that there may be "wide-ranging consultation". My understanding is that the NSW Chiropractors registration board was not even consulted regarding this document other then initial inquires. It appears that there has failed to be wide-ranging consultation and that is not acceptable.

I fail to understand why it is felt that chiropractors need a separate code of conduct. I have read the Draft Cross Professional Code of Conduct and believe that it more then adequately covers our profession. Why is there a need to hold our profession to different standard then other health professions? I believe the Chiropractic sub section is unnecessary, demeaning to the chiropractic profession and is based on past indiscretions of a few members of the profession who are a tiny minority. Why is the entire profession being limited and punished by this document? Other National Board have trusted their professions to

practice under the terms of the Cross Professional Code of Conduct, Why does the Chiropractors Board of Australia not have confidence in this as all the other National Boards have. Why doesn't the Chiropractic Board have confidence in its complaint handing mechanisms and procedures to deal with emerging trends by intelligent use of the cross – professional code.

My understanding from the NSW Registration Board, which represents 40 % of the profession, is that there are very low rate of complaints about the profession. NSW has done this using a simple code of conduct. I would suggest using a positive, informative approach which advises students and practitioners on 'value based conduct' in a general sense which allow for self governing protocol rather then the negative and demeaning approach that has been used in this document.

I have many specific concerns with the draft code. I have discussed my greatest concerns below.

Radiography within Chiropractic plays a much larger role then just ruling out red flags. As a chiropractor this document restricts the reason I take x-rays. I use x-rays not only for assessing red flags, but to gain more insight into the structural integrity of a person's spine, determine the degree of degeneration and congenital anomalies present. This helps me to determine the technique of choice I would consider appropriate for the patient. I believe my ability to provide appropriate and safe care would be severely limited by the radiological restrictions that are being suggested by the board. There are many recognised techniques that use x-ray analysis including CBP, Gonstead and atlas orthogonal. How are these practitioners meant to continue to use these techniques under this document? To limit x-rays in this way not only restricts chiropractors but also the choice of health consumers.

With regard to Chiropractic care for children again there is a heavy handed approach being applied. There is no evidence that chiropractic is not of benefit. Requiring 'gold standard' criteria for Chiropractors is unfair and discriminatory. Other health profession are not held to this standard. Why is chiropractic being singled out and victimised?

The tone of the cross-professional code of conduct is positive, encouraging and inspiring. The general tone of the draft chiropractic guidelines is demeaning and oppressive to the profession.

Having a sub section for chiropractic conduct is a legal concern as well. Will chiropractors be held accountable to the cross-professional code of conduct or the chiropractic code of conduct or both? With so much overlap between to two documents and use of different language this could be a legal nightmare in the future.

I respectfully and urgently request that an extension be granted to the deadline so that there can be wide consultation with the profession regarding these concerning proposed changes.

I further request that the National Chiropractors Board remove the code of professional Practice for Chiropractors in Australia from consideration.

I respectively submit that the draft cross-professional code of conduct is fair and general and is an appropriate guideline for our profession.

I hope for the sake of the continued success of our profession that the above changes are made to enable a broader, more positive, pro active approach to Chiropractic

Yours sincerely,

April Traynor B.Sc(hons), M. Chiro