To: Chiropractors Board of Australia

Re: Proposed guidelines

Dear Sir/ Madam,

I have some comments about the consultation paper on codes and guidelines.

Regarding *section 2.6.1*, Practitioners are encouraged to ensure an 'as low as reasonably achievable' (ALARA) approach in both taking and determining the clinical necessity for X-rays; health consumers should never be exposed to unnecessary radiation. Do all professionals using radiography have to abide by this guideline? Chiropractors have always been in the forefront of radiation protection, and other professions would do well to follow our lead.

Section 2.6.2 is about the criteria that supports the need for xrays. Nowhere is it mentioned that they may be used for determining the degree of structural change from normal, the degree of spinal decay present. Can you explain why a person under the age of 50 shouldn't be xrayed? And what about xraying children?

Section 2.6.4 Surely follow up xrays can be useful in determining clinical recovery, unless of course, you're relying on symptomatic change only!

Section2.7 on diagnostic tests and procedures is demeaning and insulting to our profession and unnecessary. Incorrect use of any diagnostic testing is unprofessional. Chiropractors have the training to interpret the diagnostic procedures they use.

Section 2.9 should be in the Acupuncture Guidelines not the chiropractic guidelines.

Section 3.2 and maintenance of equipment. Keeping maintenance records? On what equipment – adjusting tables, fax machines, computers, pens, pencils, kettles, fridges, toilets, xray viewboxes????

Section 5.1.2 Chiropractors should not "tout" for business! There is no scientific data to support the validity and reliability of screening for spinal disorders! Making of appointments at the time of the screening is not permitted!

The Board presumes us to be touting for business, creating false outcomes, engendering fear and promising cures and therefore need their guidance?

Once again, these guidelines are demeaning. Just because there's a few "rotten eggs in the basket" doesn't mean we all have to be treated as such!!

Section 5.2.1 Staff training in suicide intervention! Are other professions being forced to comply with this demand? If not, why not?

Section 2.10.7 – re adjusting asymptomatic children has not been supported by current available evidence and is currently not recommended! Subluxations can be, and are, present without symptoms. If you believe that subluxations cause multi layered spinal and systemic dysfunction, then they should be adjusted. Why wait for symptoms to appear? That's a medical approach.

I can see this guideline being used to prevent us from ever adjusting children. It's just wrong!

I have two questions regarding the Police check/working with children certificates:

1. Is this a board decision or is it a requirement of legislation?
2. Do Medicos, physios, dentists etc have to have the same certificates?

I certainly hope that all professions have to undergo the same scrutiny, because if they don't I find this requirement demeaning of us as practitioners and of our profession as a whole.

For me, these guidelines seem to have been put together by people who would contain and control our great profession. They show little respect for us or our clinical decision making abilities. Restricting our use of xray, limiting the adjusting of children, the frequency and duration of care etc goes to the very heart of chiropractic. No other Board has seen fit to include such broad-ranging restrictions on their specific professions as has the Chiropractors Board of Australia.

Every other National Board has left their profession open to regulation under the terms of the cross professional code of conduct - which are fair and general. There is a lot of unnecessary duplication in the Chiropractic guidelines that are dealt with in the cross-professional guidelines.

The tone of the cross-professional code is positive and encouraging. The general tone of the chiropractic guidelines is demeaning to our profession, assuming misconduct by chiropractors thus necessitating excessive and repressive "guidelines" in all areas of practice. This is blatantly disrespectful to our profession!

I personally believe these guidelines will do little to engender any confidence in this new boards ability to support chiropractors and chiropractic.

Yours Sincerely,

Dr Garry R Blunt (Chiropractor).