

## **Submission to the Chiropractic Board of Australia Consultation Draft Code of Conduct for Chiropractors (May7th 2010)**

May 20th, 2010

Chair,  
Code of Conduct for Chiropractors

The efforts of the Chiropractic Board of Australia in adapting the draft codes are appreciated by the chiropractic profession. These documents, whilst seeking to protect the public must also support the practice of the profession, and not seek to limit the appropriate clinical activities of the chiropractor.

In order to limit duplication of responses please note that we fully support the submission of the Chiropractors Association of Australia, National body. Approximately 55% of chiropractors in Western Australia are members of the CAA. At two recent meetings, one of which was specifically convened to discuss the initial draft of the Codes and Guidelines over 60 members attended to express their comments and concerns. The members attending supported the CAA response and were unanimous in their concern as to the prescriptive content of the initial guidelines for chiropractors and so we are pleased as to the positive action taken by the Chiropractic Board of Australia in removing that document.

It is generally considered that the board should adopt a document broadly generic, in common with the other national registration boards (especially Osteopaths and Physiotherapists) with minor alteration concerning sector specific applications. The codes may be revised as dictated by future necessity and experience.

The Board is not necessarily mandated to intrude into issues of professional contention and debate. It may not be equipped or able to make determinations as to evidence based practice and prevailing best practice. These by definition are evolutionary.

In relation to certain specific guidelines:

1. Other health professionals are able to refer patients for imaging yet there is no mention of radiology guidelines in their regulations. (Matters of radiology are still dealt with by state councils, the section is superfluous.)
2. Frequency of care and other specific references to spinal screenings etc may also be unnecessary and may be lacking evidence basis. Issues related to this may best be dealt with individually.

2.

3. Chiropractors work in a competitive health marketplace where they must be able to compete on a “level playing field”. We must not be regulated in ways different to others competing in the same health care market. The chiropractic profession will not accept being placed in a compromised position relative to other health professions by virtue of differences in our codes of conduct created by the Chiropractic Board of Australia. The Board should be mindful of the ramifications of such a situation.
4. The board is not necessarily equipped or able to make determinations as to evidence based practice and prevailing best practice. These, by definition, are evolutionary.
5. Advertising codes in many cases are onerous, unnecessary and in some cases inappropriate.
6. It is unfortunate that such a short time has been allocated for the consideration of these codes. This may be detrimental to both the outcome and the faith of the professions in the regulatory process, and may ultimately lead to issues of conflict in the future.

With respect we seek that you give serious consideration to the amendments recommended and the general comments as to the intent of the codes.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Greg Marslen', with a long horizontal flourish extending to the right.

Dr Greg Marslen  
Chiropractor  
President, Chiropractors' Association of Australia (Western Australia) Limited