

May 21 2010

Attention: Chair, Chiropractic Board of Australia

Email: natboards@dhs.vic.gov.au

The following comments from Chiropractors Association of Australia (NSW) Ltd (CAANSW) are in response to the Chiropractic Board of Australia (CBA) Revised Consultation Paper on Codes and Guidelines

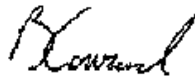
CAANSW respectfully request a response to the following comments/questions:

1. Section 1.1 – “...effective services within an ethical framework”. Request removal for same reasons as outlined in point 1. Continual use of the word “ethical” denotes that chiropractors need to be reminded to act ethically.
2. Section 1.2 – “...there are certain professional values on which..” What are these values? If the CBA are instructing chiropractors to abide by these values, the values need to be clearly stated.
3. Section 2.2 (o) - This statement does not allow for growth and development within the profession.
4. Section 2.4 (o) – “clinical outcomes” are we restricted to work only with conditions for which evidence supports clinical outcome? Would we restrict ourselves only to conditions for which we have evidence or evidence-definable clinical outcomes? Why would we limit ourselves to only helping those people?
5. Section 2.6 (d) – “....and not providing unnecessary treatment.” This statement is demeaning to chiropractors. It is suggesting that treatment is sometimes provided unnecessarily.
6. Section 2.7 – CAANSW would like clarification on what is an “emergency”. The statement “...provide assistance until no longer required” suggests that chiropractors are either uncaring or paramedics.
7. Section 3.3 (j) – CAANSW would like clarification on who the “other stakeholders” and “treating team” are
8. Section 3.7 – CAANSW questions why treating children and young people require additional responsibility. Surely the points in this section should apply to EVERY client?

9. Section 9.8 (a) – This section suggests that chiropractors are not honest and are misleading.
10. Section 9.8 (b) – This section suggests that a chiropractor would sign a document without first reading its contents. It is demeaning.
11. Section 9.10 (b) – CAANSW is seeking clarification on who exactly is “anyone entitled to ask”. What of the limitations set out in the Health Records and Information Privacy Act 2002?
12. Section 9.12 (c) – CAANSW request that this clause is removed completely. There are too many variables that need to be taken into account to make this a plausible clause.
13. Section 10.2 (c) – CAANSW questions why chiropractors need to understand the principles of immunization. This is not within the scope of chiropractic. CAANSW requests this clause be removed completely.

CAANSW look forward to receiving your response to this submission in due course.

Yours sincerely,



Bryce Conrad
President
CAA (NSW) Ltd