Friday, May 21, 2010
Attention: Chair, Chiropractic Board of Australia

The new draft is a definite improvement on the previous but there are still clauses which need to be changed. I can't understand why the Board is requiring more rigorous requirements than other health professionals namely GP's and physiotherapists. There also appears to be real Restraint of Trade issues, which the Board needs to consider.

I will outline my main concerns in the following order.

3.5 Informed consent

b). an explanation of the treatment recommended, it's likely duration, expected benefits and cost, any alternative(s) to the proposed care and their relative risks/benefits as well as the likely consequences of no care

It is not practicable to discuss every alternative to the care that we are proposing. There are different sorts of chiropractic techniques and other forms of care from other professions. Also the client has chosen to seek out chiropractic care . After perusing the Code of Conduct for Registered Health Practitioners on the Physiotherapists Board of Australia Website there is no obligation for other health practitioners such as physiotherapists or medical doctors to do the same. So why chiropractors? I propose that this requirement should be removed.

3.7 Children and young people

b). ensuring informed consent to provide care for children involves the patient's parent and/or guardian being provided with clinically relevant information for chiropractic management of certain conditions in children.

Once again Physiotherapists or Medical Doctors are not required to provide clinically relevant information for certain conditions. I propose that this section be removed or at least re-worded to say "... *guardian being provided with clinically relevant information when requested"*

10.2 Chiropractor health

Good practice involves:

a). attending an appropriate practitioner to meet health needs

b). seeking expert, independent, objective advice when a chiropractor needs health care and being aware of the risks of self-diagnosis and self-treatment

I strongly object to a Board dictating to me that I must see a health practitioner. This section definitely needs to be removed. My health is my business. I am concerned that there could be a hidden agenda for chiropractors to be vaccinated. Is this the case.

c). understanding the principles of immunisation against communicable diseases

Firstly the term should be vaccination which is a medical procedure and not part of a chiropractors scope of practice. This clause definitely needs to be removed.

d). for chiropractors who are able to prescribe, conforming to the legislation in the relevant States and Territories in relation to self-prescribing

Chiropractors cannot prescribe and therefore this clause needs to be removed.

Guideline in relation to Public Spinal Screening

c) providing the participant with a business card at their request, but should not include obtaining contact information from participants or the making of appointments at the time of the screening

This is ridiculous if the prospective client wishes to make an appointment on the spot. This seems like a restraint of trade and hinders the public. I agree that a member of the public should not be badgered to make an appointment, but if they wish to they should be allowed to.

d) that unsolicited contact is not made with participants after a screening

How can they be contacted if you are not able to get their contact details as outlined in the previous clause. This clause is made redundant by the previous one.

e) that they are only performed by a registered chiropractor or a registered student participating in an approved supervised practice program (students should be in their final year of study in course approved by the Board to become a chiropractor)

Another restraint of trade issue. If you are just checking posture and not providing an examination why does there need to be a qualified chiropractor. Why can't a GP, physiotherapist osteopath, PE Teacher, Nurse or Biomechanist, Kinesiologist, Ergonomist, Personal Trainer etc etc be taught to check posture efficiently. Why does it need to be a qualified chiropractor?
Nurses can take blood pressure at free Blood Pressure checks, why can't they be taught to check for postural problems. This is archaic and it is simply designed to stop chiropractors from getting to the public. This clause needs to be removed.

I propose that any of the above professionals be allowed to be put through a course to check posture run by an appropriate academic instituion.

f) no fee being charged for the screening, however participants may make donations to a charitable organisation nominated by the chiropractor.
In the past this has worked because the member of the public has chosen to come if for a more detailed examination. In which case the person taking the donation will need to get contact details. Its simply part of offering good service. And usually the ASRF benefits which in turn helps chiropractic researhers.

I have also read Peter Cowie's and Mark Postles submissions and I agree with these. It is also disappointing that such an important document has been given very little time for consideration by the members of the profession it proposes to assist. Most of us are good people and care for our clients/ patients.

Yours truly,

Peter Farrelly
BAppSc
Grad Dip Ergonomics