May 21, 2010

Dr Phillip Donato,
Chair, Chiropractic Board of Australia
Re: Revised Code of Conduct for Chiropractors

Dear Dr Donato,

I write in response to the Chiropractic Board of Australia's (CBA) letter to the Chiropractors' Association of Australia (CAA), of which I am a member, inviting interested stakeholders to make a submission on the proposed code of conduct for chiropractors. I would like to thank the CBA for the opportunity of responding to such guidelines.

Of particular concern, is the time frame made available for stakeholders Australia wide to find, examine and respond to the proposed guidelines. The National Law includes a requirement for national boards to ensure there is wide-ranging consultation on proposed registration standards, codes and guidelines. It must "ensure that the consultation process is rigorous, open, transparent and fair." This has not been the case. The deadline denies any Chiropractor or relevant stakeholder the chance to effectively digest and respond to such guidelines. Given the importance and complexity of such a document, I am disappointed at the inadequate timeframe afforded to stakeholders for appropriate consultation.

Further, on a number of occasions the proposed code of conduct refers the reader to its website "www.chiropracticboard.gov.au" for further guidelines only to find their absence. I find this to be misleading and does not constitute being "open,

transparent or fair." It is unreasonable for the profession to comment and commit to guidelines that reference documents not obviously made available. Again, there is a clear case to be made for inadequate consultation with stakeholders.

I would like to commend the board on their hard work thus far and I am sure that this proposed code of conduct is done with best intentions, but feel that this process has been far too rushed. Further, I fail to understand the need to place chiropractors under further, more stringent guidelines than other similar health professions such as physiotherapy and osteopathy? Would it not be appropriate to consider guidelines in keeping with the other health professions? After all, the new Australian Health Practitioner Regulation Agency (AHPRA) aims to "simplify the professional regulatory system," not complicate it.

Thank you again for the opportunity to make comments on the "*Revised Code of Conduct Guideline*", I look forward to my concerns being addressed.

Yours sincerely,

Christian Burke

Chiropractor

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