To:
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Subject: Fw: Revised Consultation Draft Code of Conduct

16th May, 2010

Attention: Chair, Chiropractic Board of Australia

natboards@dhs.vic.gov.au

Revised Consultation Draft Code of Conduct

Dear Dr Donato and Board,

Thank you for the opportunity to comment on the revised draft of the Code of Conduct.
My overall first impression is very positive. It is obvious that The Board has responded to the initial submissions and has strived to present a balanced and workable document.
I do have some suggestions that I feel would benefit the final document and I will list these below.

- Overview: In the first sentence the words "within an ethical framework" seem to signal a theme that, to me, goes overboard in this document. The point that the Code contains standards pertaining to ethics is mentioned in the second paragraph, bullet point 7 "professional behavior and ethical conduct" and also in many other places throughout the document.
- There is a concern amongst a lot of the Chiropractors I have spoken to that the majority of practitioners who go about their business in an ethical and professional manner are worried that the actions of a few unethical practitioners are damaging their reputations and that the Code seems to be supporting the (incorrect) impression that Chiropractors act unethically.
- On reading the proposed Code of Conduct for the other Health Boards I can see that much of the wording of the Code of Conduct for Chiropractors is simply the same as other Boards with the word Chiropractor inserted to replace the more generic "health professionals" and "practitioners" . I suggest that you take a more general tact and use the words "health professionals" and "practitioners" instead of specifically nominating Chiropractors. This, I believe, would make The Code more palatable to Chiropractors who feel that The Board is implying that Chiropractors act unethically while still maintaining the intended message.
- 3.4 (e) Genetics is a broad field and not something that Chiropractors come into contact with in daily practice. I feel that this clause is a strange inclusion in this Code. I don't understand where a Chiropractor would disclose, specifically, genetic information and to who. This seems unnecessary.
- 3.6 (g) & (h) I feel that the prescribed time of 3 months for a pre-paid plan in unrealistic. I whole-heartedly agree that all care plans need to be reviewed and modified as indicated by the results of the review. However, if a practice follows section 3.6 - points (a)to (f) then each practitioner should be able to determine the length of time that they offer this arrangement and each patient should then be able to decide if they wish to enter into this agreement with the practitioner or not. I feel that these points should be removed.
- 4.1 As this is a national document I feel it is inappropriate to mention Victorian Chiropractors who wish to practice acupuncture. It is wrong to specify conditions that apply to a small number of registrants.
- 9.11 (d) - (h) These points are not appropriate for Chiropractors. This seems to be left over from he other board's codes.
- 9.12 (c) This would mean that The Board wants a Chiropractor to keep a list of every christmas, birthday, gratitude gift that they are given. This is not realistic. If a Chiropractor was to receive an inappropriate gift, and a complaint was lodged with The Board, then I am confident that The Board will be able to decide this and act accordingly.
- 10.2 (c) I agree with Dr Peter Cowie's sentiments here "Proscribing a specific component of public health policy in this document, except to push a specific agenda, is not necessary. The principles of good hygiene and sanitation are not proscribed here and they have infinitely more evidence backing their understanding and utilisation. This clause does not belong in this document and must be removed. If someone on the Chiropractic Board of Australia has an agenda or conflict in this area it must be declared."

I thank The Board for it hard work in preparing us all for national registration.
Yours Sincerely,

Tim Wade-Ferrell
Doctor of Chiropractic

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