Forest
CHIROPRACTIC CENTRE

19 May 2010.

Attention: Chair, Chiropractic Board of Australia

Introduction

To begin my response to the proposed revised Code of Professional Practice for Chiropractors in Australia, I'm disappointed to report that sections of these chiropractic guidelines, despite a significant show of genuine concern and constructive feedback from members of the chiropractic profession, remain irrelevant, offensive, damaging and undermining to the chiropractic profession.

To reiterate points in my initial submission, sections of these proposed guidelines are insulting to our profession, chiropractic colleges and National Board of Chiropractic Examiners. They insinuate that we graduate and licence incompetent, dishonest chiropractors in Australia and that there is a lack of evidence to support chiropractic care and how most chiropractors practice in Australia. This undermines the profession's credibility. In any profession, individuals of questionable character can and do slip through the cracks, but this surely is the exception and does not reflect any profession as a whole.

Can we not simply agree to be honest and govern ourselves with integrity? In no way does protecting the public require or justify the National Board to mandate such oppressive, and unnecessary restrictions on the practice of chiropractic in Australia and demean the profession in the process.

The spirit of these guidelines is to oppress the chiropractic profession in Australia and not to protect the public.

This proposed code of conduct poses a great detriment to the clinical protocols and practice of chiropractic and this undermines and is damaging to the chiropractic profession and the public as well.

It appears that the individual(s) who constructed these practice guidelines made no consideration of the philosophical constructs and scientific validation of the chiropractic wellness paradigm.

I have also reviewed the comments submitted to the Board by Dr. Peter Cowie and Dr. Mark Postles, and I give full support to their submissions.

The following are some areas of the proposed guidelines that I still strongly object to.

In no way does this constitute a complete list of objections due to the short time constraints given to review these Guidelines.

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Appendix 1:
Guideline in relation to Public Spinal Screening

Although I understand and agree to some points in the screening guideline I strongly feel there is no need to include this guideline at all in the code. Spinal screenings are a huge activity of public service and practice building for many practices. It is not the place of the Board to restrict and regulate spinal screenings. Appendix 1 should be completely removed from the code.

Sections to which I strongly disagree are:

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 section (c) should be removed from the code. It is irrelevant and undermines the chiropractor. What gives us the right to know the truth and not help others? If a member of the public agrees to be screened, and indicators of vertebral subluxation are detected, the next reasonable and responsible step (our duty of care) is to offer a confirming examination at the practice.

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)

This section (e) is irrelevant and should be removed from the code. Assessing posture is not a controlled act. As long as an individual is properly trained on screening protocols and methods and clearly informs the participants that they are not a chiropractor or health professional and not offering a diagnosis, it is irrelevant who performs the screening.

Appendix 3:
Guideline in relation to Duration and Frequency of Care

The spirit of Appendix 3 falls under the allopathic paradigm and not the wellness paradigm that is central to the practice of chiropractic. For example, the words treatment, symptoms and diagnosis are medical nomenclature.
Due to the fact that the allopathic and wellness paradigms are clearly different from each other, it makes these proposed guidelines philosophically and scientifically invalid and confusing. One cannot practice chiropractic in the allopathic model. This proposed code of conduct poses a great detriment to the clinical protocols and practice of

chiropractic and this undermines and is damaging to the chiropractic profession and the public as well.

It appears that the individual(s) who constructed these practice guidelines made no consideration of the philosophical constructs and scientific validation of the chiropractic wellness paradigm.

Appendix 3 should be completely removed from the code.

Conclusion and Recommendation:

The proposed Code of Professional Practice for Chiropractors is fundamentally flawed, unnecessary and detrimental to the chiropractic profession and public.

The spirit of the code does not protect and preserve the traditional chiropractic paradigm. Instead the proposed code is demeaning and undermines the chiropractic profession.

These proposed guidelines attempt to fit chiropractic into the constructs of allopathy which is both philosophically and scientifically invalid and confusing. This is a sign of ignorance regarding the understanding of the philosophy of chiropractic and the available valid research that supports chiropractic intervention to all sectors of the community.

It is with humble reverence that my recommendation to the National Chiropractors Board is to remove the Code of Professional Practice for Chiropractors in Australia from consideration.

It is not mandatory under Part 5, Division 3 Registration standards and codes and guidelines; and
The development of this code was done in the absence of extensive professional consultation, contrary to Section 40 and is based on dogma not science.

Sincerely,

Keith Farrugia B.Sc.,D.C.,F.I.C.P.A.

References:
AHPRA (2010) Consultation paper on codes and guidelines.
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