To:
Cc:
Bcc:
Subject: Fw: 'Attention: Chair, Chiropractic Board of Australia'

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I would submit the following general comments as my submission to the Chiropractic Board of Australia re: Revised Guidelines

- No guidelines should be more prescriptive or onerous than our most similar professions. ie. Physiotherapy and

  Osteopathy

- The tight timeline and short consultation period should direct the board to formulate a basic guidelines document that can

  be amended or revised as the need arises, allowing for fuller more considered development by stakeholders.

- Attention should be given the the recent UK experience thru the GCC. It appears that Vertebral Subluxation is being

  reduced to history and only certain conditions can be discussed in public forums by the profession.

  See attachment Death of Subluxation.

- The other health professions with the right of x-ray referral do not mention this guideline in their regulations. Why are we

  any different?

- The formulation/drafting of the guidelines appears to have been captured by an unrepresentative narrow view of

  Chiropractic practice. Those who have traditionally opposed chiropractic will use this against the profession as we serve

  the public.

- Raise with the other professions whose practices use "SMT" the need for

minimum standards.

- Ignore the AMA recommendation on the use of the title Dr. The public will not be confused.

For more specific comment I refer you to the submission By Dr Peter Cowie, long time Chiropractic Board member in NSW. As NSW is our largest jurisdiction, numbers and type of complaints involving chiropractors within that jurisdiction should be an accurate reflection of any problems under existing state legislation. P Cowie stated this at the meeting of all Chiropractic boards in Hobart and accordingly publically questioned the need for such restrictive guidelines.

He also stated in a recent submission,"In Australia's largest jurisdiction; NSW with over 1400 chiropractors, a simple code of conduct in a similar vein to the cross – professional code has sufficed to guide the profession to a very low number of complaints for over thirty years."

I commend his specific comments to you. See attachment Cowie Submission II

Thank you for your consideration of this submission

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[attachment "The Death of Subluxation editorial by Dr Matthew McCoy.docx" deleted by Caroline Kettle/HeadOffice/DHS] [attachment "Cowie Submission II.docx" deleted by Caroline Kettle/HeadOffice/DHS]