‘Attention’, Chair, Chiropractic Board of Australia
natboards@dhs.vic.gov.au

I would like to reiterate the sentiments offered by Dr Postles, and Dr. Benz in their responses to the proposed codes and guidelines. In addition, I would like to add further comment.

The formulation of the guidelines appears to have been captured by a minority, unrepresentative sector of the profession focused on setting the parameters governing the majority.
It is evident the authors are seeking to pursue their political agendas, and force their personal opinions onto the chiropractic profession under the guise of standards or codes of the board.

The documents are rife with vagueness, restrictions to practice that are unsubstantiated in the published literature, and arbitrary limits that are scientifically invalid and potentially damaging to the public. There are seemingly irrelevant statements, of which the true purpose of, are being hidden or deliberately left obtuse by the authors.

In the AHPRA web site, (www.ahpra.gov.au) there can be found the sentence “…, Australia is simplifying its professional regulatory system and strengthening public protection.” The documents are clearly not in the spirit of ‘simplifying the professional regulatory system and strengthening public protection’.

The authors seek to create dramatic changes to the practice of chiropractic that are without precedent. Seeking to enshrine personal opinion and pushing hidden political agendas is not ‘development of chiropractic profession standards, codes and guidelines’ (see the CBA’s website under ‘functions’), so I contend that the offending authors have deliberately exceeded their mandate, and should be removed from office.

The board has demonstrably overstepped its mandate, namely the protection of the public. It is not mandated to intrude into issues of professional contention and debate. It is not equipped or able to make determinations as to evidence-based practice and prevailing best practice. These, by definition are evolutionary. Why has our board, uniquely among the national boards taken a course so unpopular with the profession it sets out to regulate?

It was been indicated that the CBA has not published all the submissions as it stated it would. Specifically, additional guidelines pertaining to advertising and mandatory reporting. In the name of transparency, democracy and fairness, how is this allowed to

happen? As a chiropractor I feel disenfranchising and cynical regarding my own profession.

Further, for the board to engender the spirit of ‘simplifying’, and ‘professional standards’, it would be congruent to be clear, precise and un-ambiguous, as well as honest and respectful. The authors of these documents, by being unclear, ambiguous and vague, as well as disrespectful, are damaging the integrity of the board, and again should be removed from office.

Through both submissions, the board itself has been at pains to point out the tight timeline. Given this reality, would it not be appropriate to adopt a ‘minimalist’ document, which can be revised *as dictated by future necessity and experience.*

My proposal is simply that the CBA adopt a document broadly generic, in common with the other national registration boards (especially Osteopaths and Physiotherapists) with minor alteration concerning sector specific applications.

Kind Regards,

Dr. Jody Shawn DC