Attn: Chair, Chiropractic Board of Australia
natboard@dhs.vic.gov.au

Submissions to the Chiropractic Board of Australia
Consultation Draft Code of Conduct for Chiropractors dated May 7th 2010

Chair,

Code of Conduct for Chiropractors.

I have no doubt that undertaking the task of developing a Code of Conduct for Chiropractors is no simple task, however, as a Chiropractor, I would hope the Code of Conduct I need to adhere to would be supportive of the profession and written in a way that I as a Chiropractor I won't need a law degree to understand it. For the most part I find it well written but there are some areas where I find the wording confusing and contradictory and at times somewhat antagonistic.

I would appreciate your time in considering the following concerns:

Section 1.3 Australia and Australian Health Care and Appendix 3 Guideline in relation to Duration and Frequency of Care

In Section 1.3 it states that "Chiropractors have critical roles in caring for people who are unwell, assisting people to recover and seeking to ensure people stay well".

I strongly believe this to be true and am disappointed and confused as to why the wording of Appendix 3, particularly paragraphs 4 and 6, appear to contradict the above statement and suggest that care in the absence of symptoms is frowned upon, and as such, are we as Chiropractors likely to be brought in front of a court of law for providing any form of asymptomatic or pro-active preventative health care?

I understand the agenda of attempting to minimise the risk of perceived over-servicing in our profession, however, even the WHO definition of health states that health is not merely the absence of disease, and I do not understand a body which is supposed to support our profession and understand its roles in health care, can in one section agree with our role in preventative health care and in the last paragraph denounce it.

My understanding of the current political agenda in health reform is to also encourage preventative and pro-active health care and reduce the strain on our current health system. As a Chiropractor who strives to care for people who are unwell, assist them to recover and seek to ensure they stay well, I would like to see this appendix re-worded so that it assists in promoting Chiropractic's role in preventative health care rather than discourage it.

Section 3.7 Children and young people

I'm not sure I agree that caring for young people brings additional responsibilities for Chiropractors, however, my major concern with the wording of this section is in regards to informed consent. My understanding currently is if a patient is under 18 then I need parental or legal guardian consent. If the age of consent is to be different please state it rather than be ambiguous and open Chiropractors up to potential penalty at a later date for misinterpreting the ambiguity.

Appendix 2: Guideline in relation to Radiology/Radiography

Although this section does not directly state Chiropractors shouldn't take or refer for x-rays, the overall tone of this appendix appears to discourage the use of radiographic imaging.

As a profession who has had at times had its safety and validity questioned, I find it extremely disappointing that our own body would appear to discourage the use of radiographic imaging and in my opinion therefore potentially adversely affect the safety of care for our patients.

I would also be concerned that this document may at a later date be used to reduce the availability of diagnostic imaging for Chiropractors and again increase the potential risk of Chiropractic care and would, therefore, like to see this Appendix re-worded to avoid this.

3.11 Adverse events and open disclosure

I would like to see the wording of the last sentence of paragraph 1 re-worded to avoid the use of the term 'when something goes wrong'. Perhaps 'if there is an adverse reaction' or similar would be better wording as an adverse reaction does not always mean something 'has gone wrong' and whether or not something has 'gone wrong' may need to be determined by a legal body or professional idemnity insurer.

3.3 Effective communication

This is of more minor concern, however, paragraph (i) involving language interpreters. I personally feel it should not be the responsibility of the Chiropractor to avail of language interpreters.

Thank you for your time in reading the abovementioned concerns and I submit that the Chiropractic Board of Australia amends the revised code to reflect those concerns.

Yours sincerely,

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